

# Integrated Sustainability Appraisal (ISA) for the Blaenau Gwent Replacement Local Development Plan

Initial ISA Report

Blaenau Gwent County Borough Council

December 2019

#### Quality information

Prepared by	Checked by	Verified by	Approved by
Rosie Cox Environmental Planner	Alastair Peattie Associate Director	Nick Chisholm-Batten Associate Director	Nick Chisholm-Batten Associate Director
Chris McNulty Senior Environmental Planner			

#### **Revision History**

Revision	Revision date	Details	Name	Position
v1	21/08/19	Working draft for review	Alastair Peattie	Associate Director
v2	12/09/19	Revised working draft following comments from the Council	Alastair Peattie	Associate Director
v3	22/11/19	Draft for client review and comment	Alastair Peattie	Associate Director
v4	17/12/19	Final for consultation alongside Preferred Strategy	Alastair Peattie	Associate Director

#### Prepared for:

Blaenau Gwent County Borough Council

#### Prepared by:

AECOM Infrastructure & Environment UK Limited 3rd Floor, Portwall Place Portwall Lane Bristol BS1 6NA United Kingdom

T: +44 117 901 7000 aecom.com

© 2019 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

THIS PAGE IS INTENTIONALLY LEFT BLANK

## **Table of Contents**

1. Introduction       1         2. What is the revised LDP seeking to achieve?       4         3. What is the scope of the ISA?       7         Part 1: What has Plan-making/ ISA involved up to this point?         4. Introduction (to Part 1)       10         5. Establishing the Reasonable Alternatives       12         6. Appraising the Reasonable Alternatives       15         7. Developing the Preferred Strategy       21         Part 2: What are the ISA findings at this stage?         8. Introduction (to Part 2)       26         9. Appraisal of the Pre-Deposit revised LDP       27         10. Summary appraisal findings for the Pre-Deposit revised LDP       58         Part 3: What happens next?         11. Introduction (to Part 3)       62         12. Next Steps       62         13. Monitoring       62         Appendices         Appendices       64         Appendix I: Regulatory requirements       64         Appendix II: Scoping information       68         Appendix II: Appraisal of Strategic Options       196	Intro	duction	
3. What is the scope of the ISA?	1.	Introduction	1
3. What is the scope of the ISA?	2.	What is the revised LDP seeking to achieve?	4
4. Introduction (to Part 1)	3.		
5. Establishing the Reasonable Alternatives	Part	1: What has Plan-making/ ISA involved up to this point?	
6. Appraising the Reasonable Alternatives	4.	Introduction (to Part 1)	10
7. Developing the Preferred Strategy	5.	Establishing the Reasonable Alternatives	12
Part 2: What are the ISA findings at this stage?  8. Introduction (to Part 2)	6.	Appraising the Reasonable Alternatives	15
8. Introduction (to Part 2)	7.	Developing the Preferred Strategy	21
9. Appraisal of the Pre-Deposit revised LDP	Part	2: What are the ISA findings at this stage?	
10. Summary appraisal findings for the Pre-Deposit revised LDP	8.	Introduction (to Part 2)	26
Part 3: What happens next?  11. Introduction (to Part 3)	9.	Appraisal of the Pre-Deposit revised LDP	27
11. Introduction (to Part 3)	10.	Summary appraisal findings for the Pre-Deposit revised LDP	58
12. Next Steps	Part	3: What happens next?	
12. Next Steps	11.	Introduction (to Part 3)	62
Appendices Appendix I: Regulatory requirements	12.	Next Steps	62
Appendix I: Regulatory requirements	13.	Monitoring	62
Appendix II: Scoping information68	Appe	endices	
Appendix II: Scoping information68	Appe	endix I: Regulatory requirements	64

Introduction

## 1. Introduction

## **Background**

1.1 AECOM is commissioned to lead on an Integrated Sustainability Appraisal (ISA) in support of Blaenau Gwent County Borough Council's replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG).

## ISA Explained

- 1.2 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the development plan's contribution to sustainable development.
- 1.3 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WBFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP. A description of each of the various components and their purposes is provided below.

#### **Sustainability Appraisal (SA)**

- 1.4 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>1</sup>. It also widens the scope of the assessment from focusing largely on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Development Plans under Section 19(5) of the Planning and Compulsory Purchase Act 2004.
- 1.5 In line with the requirements of the SEA Directive, the two key steps in SA are that:
  - When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
  - 2. A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.6 The Welsh Government draft LDP Manual states that SA, incorporating SEA, plays an important part in demonstrating that the LDP is sound by ensuring that it reflects sustainable development objectives and that it should be integral element at each stage of plan-making.

#### **Equalities Impact Assessment (EqIA)**

1.7 As a public-sector organisation, Blaenau Gwent County Borough Council has a duty under the Equality Act 2010<sup>2</sup> and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the RLDP avoid unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with

<sup>&</sup>lt;sup>1</sup> Directive 2001/42/EC

<sup>&</sup>lt;sup>2</sup> Equality Act 2010 [online] available at: <a href="http://www.legislation.gov.uk/ukpga/2010/15/contents">http://www.legislation.gov.uk/ukpga/2010/15/contents</a>

protected characteristics<sup>3</sup> and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

#### **Health Impact Assessment (HIA)**

1.8 The Public Health (Wales) Act 2017 contains a provision to require a Health Impact Assessment (HIA) to be carried out to assess the likely effect of the proposed development plan on health and mental well-being and inequality. The HIA process provides a systematic yet flexible and practical framework that can be used to consider the wider effects of LDP policies and how they, in turn, may affect people's health.

#### Welsh Language Impact Assessment (WLIA)

- 1.9 The Welsh Government is committed to supporting the Welsh Language so that it can thrive and grow across Wales. The Welsh Language must be considered from the outset of the development plan process. It is a legislative requirement that the SA must include an assessment of the likely effects of the plan on the use of the Welsh language (The Planning (Wales) Act 2015 (Section 11).
- 1.10 Planning Policy Wales (PPW) (2018) sets the policy requirements for Welsh language. Technical Advice Note 20: Planning and the Welsh Language provides guidance on the consideration of Welsh language as part of the development plan process. The TAN provides advice on incorporating the Welsh language in development plans through the SA and the policy approach to anticipated windfall development. In summary, planning authorities must consider the likely effects of their development plans as part of the SA process and include a statement within the Deposit Plan on how this has been considered and or addressed within the development plan. The SA process is the mechanism for considering how the scale and location of growth, the vision, objectives, policies and proposals individually and in combination, impact on the Welsh language. Where evidence indicates a detrimental impact on the use of the Welsh language the LPA can assess whether the strategy should be amended or mitigation measures should be identified.

#### Well-being of Future Generations (Wales) Act 2015

1.11 The Planning (Wales) Act 2015 sets out the definition of sustainable development for the planning system in Wales, mirroring the definition in the Well-being of Future Generations (Wales) Act 2015 (WBFGA).

"Sustainable development means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals".

- 1.12 The WBFGA sets seven well-being goals which all public bodies are required to achieve:
  - A prosperous Wales;
  - A resilient Wales;
  - A healthier Wales;
  - A more equal Wales;
  - A Wales of cohesive communities;
  - A Wales of vibrant culture and thriving Welsh language; and
  - A globally responsible Wales.
- 1.13 The Act also identifies five ways of working which public bodies need to demonstrate they have carried out when undertaking their duty to achieve sustainable development. These are:

<sup>&</sup>lt;sup>3</sup> Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

involvement, collaboration, integration, prevention and long term factors. The well-being goals and the five ways of working can be used to inform and structure the ISA framework.

#### **This Initial ISA Report**

1.14 This Initial ISA Report<sup>4</sup> is published alongside the Pre-Deposit revised Local Development Plan. Any representations received will be taken into account and a revised ISA Report will be published subsequently alongside the Deposit RLDP.

<sup>&</sup>lt;sup>4</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report; and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

## 2. What is the replacement LDP seeking to achieve?

2.1 Blaenau Gwent County Borough Council ('the Council') is in the process of preparing a replacement Local Development Plan (RLDP) for the County Borough. The LDP is the Council's land use plan that will establish where and how much new development will take place in the County Borough over the period 2018-2033. It will also identify which areas are to be protected from development and will replace the existing Local Development Plan (LDP 2006-2021) once adopted.

## **Challenges**

- 2.2 A number of Borough issues/ challenges have been identified that the RLDP will need to address during the plan period and these are as follows:
  - Economic growth;
  - 2. New roles for town centres;
  - 3. Improving education attainment and skills;
  - 4. Population growth and improving housing offer;
  - 5. Creating a well-connected network of communities;
  - Supporting Sustainable transport;
  - 7. Promoting physical and mental health and well-being for all;
  - 8. Creating a place which supports its green environment;
  - 9. Sustainable use of natural resources;
  - 10. Environmental quality;
  - 11. Sustainable design and the provision of renewable energy; and
  - 12. Creating places with a distinctive sense of identity.

#### **Vision**

2.3 The vision for the RLDP is set out below.

"Through collaborative working, by 2033, Blaenau Gwent will become a network of connected **sustainable**, **vibrant valley communities** that support the **well-being** of current and future generations with:

- a prosperous low carbon economy where people have the skills, knowledge and opportunities to achieve a better quality of life;
- residents living in well connected, healthy and safe communities, in a range of good quality homes and having better access to services; and
- its **distinctive natural environment**, cultural and historic identity is protected and enhanced creating a place where people want to live, work and visit".
- 2.4 The RLDP Vision has been broken down into four outcomes and these are considered central to the delivery of the RLDP vision as they embrace the principles of sustainable development and the concept of placemaking and embed the duties set out in the Well-being of Future Generations Act 2015.
  - Outcome 1: Create a Network of Sustainable Vibrant Valley Communities (Placemaking)
  - Outcome 2: Create Well-Connected, Active and Healthy Communities

- Outcome 3: Create Opportunities for a Prosperous Low Carbon Economy and Promote Learning and Skills
- Outcome 4: Protect and Enhance the Distinctive Natural and Built Environment

## **Objectives**

2.5 Under the four key Outcomes sit 19 objectives which have been identified to address the challenges facing the County Borough and to reflect updated national policy and legislation. The objectives are set out in the table below and structured according to the theme under which they sit.

#### Table 2.1: RLDP objectives

RLDP Headline objective number

**RLDP** objective

Outoomi	o ii Giodio di Not	work of Gustamasic Visitant Valley Communities (Flacemaking)
1	Spatial Strategy	To promote the 4 main settlements of the County Borough as the focus for major employment, commercial and residential development
LDP Cha	llenges Addresse	d: 1, 2, 4, 5, 6
2	Demography	To increase opportunities for people to live and work within Blaenau Gwent resulting in population growth.
LDP Cha	llenges Addresse	d: 1, 2, 3, 4, 5, 6
3	Placemaking	All developments should contribute to creating high quality, attractive, safe and sustainable places which enhance the community in which they are located whilst having regard to the natural, historic and built environment and supporting and safeguarding the Welsh language.

#### LDP Challenges Addressed: 7, 8, 9, 10, 11, 12

4 Climate Change

To minimise climate change impacts through reduced emissions of greenhouse gases in both new and existing developments, and to adapt to climate change through considerations of its effects through the design and location of new developments. This can be achieved by:

- Maximising the use of previously developed land;
- Promoting the re-use and restoration of derelict land and buildings;
- By focussing development away from areas vulnerable to flooding;
- By increasing the supply of renewable energy;
- Encouraging balanced job and population growth to reduce out commuting;
- Provision of broadband connectivity to reduce the need to travel;
- Provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality; and
- Provision of quality green infrastructure.

LDP Challenges Addressed: 6, 8, 9, 10, 11

#### Outcome 2: Create opportunities for a prosperous low carbon economy and promote learning and skills

5 Economic Growth

To support economic growth through the creation of a thriving well-connected, diverse economy which provides a range of good quality employment opportunities to enable indigenous business growth, attract inward investment and competitive innovative businesses in appropriate growth sectors.

#### LDP Challenges Addressed: 1

Education and To contribute to the improvement of the education and skills infrastructure through ensuring Skills that skills and training match economic growth sectors and facilities can be accessed by all.

#### LDP Challenges Addressed: 3

RLDP objective number	Headline	RLDP objective
7	Minerals/ Waste	To meet the County Borough's national, regional and local requirements to manage and dispose of its waste and to safeguard and to use its mineral resource in a sustainable manner.
LDP Challe	enges Addressed	: 9
8	Circular Economy	Promote the circular economy and make the best use of material resources for the benefit of both the built and natural environments.
LDP Challe	enges Addressed	: 9
9	Tourism	Develop a growing tourism economy to support sustainable and vibrant town centres recognising the role of the County Borough's proximity to the Brecon Beacons National Park, local heritage and leisure opportunities.
LDP Challe	enges Addressed	: 1, 2, 12
Outcome :	3: Well Connecte	ed, Active and Healthy Communities
10	Housing	To improve the range and quality of housing through ensuring new developments contain a mix of house types and tenures thus providing affordable, accessible and aspirational homes for existing and future residents.
LDP Challe	enges Addressed	: 4
11	Town Centres	To sustain and enhance a network of 4 town centres serving their own populations and valley catchments whilst recognising that the role of these centres is evolving.
LDP Challe	enges Addressed	: 2, 5
12	Sustainable Transport	To promote accessibility for all by prioritising walking and cycling (active travel) then public transport and finally motor vehicles thus reducing air borne pollution, the need to travel and dependency on private vehicles.
LDP Challe	enges Addressed	: 6
13	Accessibility	To create a network of well-connected settlements where services are easily accessible through improved integrated sustainable modes of transport.
LDP Challe	enges Addressed	: 5
14	Infrastructure	To create an accessible network of green open spaces and high quality leisure and community infrastructure to contribute towards improving health and well-being.
LDP Challe	enges Addressed	: 7
Outcome 4	4: Protect and E	nhance the Distinctive Natural and Built Environment
15	Ecosystems	To protect, enhance and manage the ecosystems of Blaenau Gwent by enabling them to adapt to climate change through connecting existing areas by creating new linkages and stepping stones.
LDP Challe	enges Addressed	: 8
16	Green Infrastructure	Promote multi-functional green infrastructure with an emphasis on its integration with existing and new development.
LDP Challe	enges Addressed	: 7, 8
17	Landscape	To protect, enhance and manage the distinctive landscape of Blaenau Gwent to help foster sustainable tourism and community pride.
LDP Challe	enges Addressed	: 8, 9
18	Historic/ Cultural	To protect and enhance the historical and cultural environment of Blaenau Gwent to contribute to the regeneration of the area.
LDP Challe	enges Addressed	: 12
19	Environmental Quality	To safeguard the quality of water, air and soil and tackle all sources of pollution including noise.
		10

Prepared for: Blaenau Gwent County Borough Council

RLDP objective number

Headline

**RLDP** objective

## 3. What is the scope of the ISA?

#### Introduction

- 3.1 The aim here is to introduce the reader to the scope of the ISA, i.e. the sustainability issues/ objectives that should be a focus of (and provide a broad methodological framework for) ISA.
- 3.2 Further information on the scope of the ISA i.e. a more detailed review of sustainability issues/ objectives as highlighted through a review of the sustainability 'context' and 'baseline' is presented in **Appendix II**.

## Consultation on the scope

3.3 The Regulations require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies". In Wales, the consultation bodies are the natural Resources Wales and Cadw.<sup>5</sup> A Scoping Report was sent to the statutory consultees for comment between 31st October and 05th December 2018. The responses received were taken into account and amendments were made to the baseline information and draft ISA Objectives where necessary. A Final Scoping Report was produced in January 2019. Since that time, the ISA scope has evolved as new evidence has emerged and there have been some minor refinements to the ISA objectives following a review by AECOM - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2018.

## Key issues and ISA objectives

- 3.4 The analysis of relevant policies, plans and programmes and the baseline informed the identification of key sustainability issues. These are presented in **Appendix II**.
- 3.5 ISA objectives were established to address these key issues. Taken together, the sustainability objectives, presented in **Table 3.1**, provide a methodological 'framework' for undertaking the appraisal of the RLDP and reasonable alternatives. The objectives are structured according to the ISA themes.

Table 3.1: ISA framework

ISA theme	ISA objective	
Economy and Employment	To promote economic growth and maximise the economic contribution of the area to the Cardiff City Region, strengthening and diversifying the economy, promoting tourism, enhancing the vitality and viability of town centres and increasing prosperity for all.	
	To increase levels of local employment and ensure distribution of opportunities, whilst improving educational attainment and increasing skill levels	
Population and Communities	To provide a sufficient quantity of good quality market and affordable homes in sustainable locations to meet identified needs.	
	To enhance design quality to create great places for people.	

<sup>&</sup>lt;sup>5</sup> In accordance with Article 6(3).of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

Health and well-		
	To improve the health and well-being of the population including physical and mental health, social well-being and community safety.	
Equalities, diversity To and social inclusion co	To reduce poverty and inequality; tackle social exclusion and promote community cohesion.	
<b>Movement</b> si	To improve access for all to the jobs, services and facilities they need whilst supporting a reduction in the use of private transport by promoting active travel and encouraging modal shift to sustainable transport, and improving access to high quality digital communications and utilities.	
(Air, Land, Minerals p	To identify and pursue any opportunities to reduce, or at least, minimise oppulation exposure to air pollution.	
m	To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting where possible higher grade agricultural land.	
re	To promote the circular economy by reducing waste generation and maximising reuse and recycling, ensuring the use of natural resources and the provision of an adequate supply of minerals.	
	To conserve, protect and enhance the water environment, water quality and water resources.	
	To conserve, protect and enhance biodiversity and geodiversity interests within and surrounding Blaenau Gwent.	
<b>Environment</b> e	To conserve and enhance the significance of the County Borough's historic environment, cultural assets (including the use of the Welsh language) and heritage assets and their settings.	
Landscape To	To protect and enhance the quality and character of the landscape.	
	To mitigate and adapt to the effects of climate change through increasing energy efficiency and generation and use of low carbon and renewable energy sources.	
Flood Risk To	To reduce and manage the risk of flooding.	

Part 1: What has Plan-making/ISA involved up to this point?

## 4. Introduction (to Part 1)

4.1 Local plan-making has been underway since October 2018, with a wide range of evidence produced to inform the development of the RLDP. **Table 4.1** sets out the key RLDP and SA Documents published along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.<sup>6</sup>

Table 4.1: Replacement LDP and ISA stages

RLDP Documents & Consultation	ISA Documents & Consultation	
	ISA Scoping Report Sent to statutory consultees for consultation between 31 <sup>st</sup> October and 05 <sup>th</sup> December 2018	
Preferred Strategy Public consultation from Thursday 16 <sup>th</sup> January 2020 to Thursday 27 <sup>th</sup> February 2020	This Initial ISA Report and NTS Public consultation from Thursday 16 <sup>th</sup> January 2020 to Thursday 27 <sup>th</sup> February 2020	

- 4.2 This part of the Initial ISA Report sets out the work undertaken in 2018/ 19 that led to the development of the Preferred Strategy document that is currently the focus of the appraisal (see Part 2, below) and currently published for consultation. Specifically, in-line with regulatory requirements (Schedule 2 of the SEA Regulations), there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the draft plan for publication.
- 4.3 This part of the report presents information regarding the consideration of reasonable alternatives. This information is important given regulatory requirements.<sup>7</sup>

## What is the key issue for the plan?

- 4.4 Whilst the plan objectives (see chapter 2, above) are numerous and cover a range of issues, it is clear that an overarching objective<sup>8</sup> relates to the identification of land to meet housing and employment needs. Determining an approach to housing and employment growth is the primary means by which the plan seeks to achieve wide ranging objectives. It is the matter at the heart of the plan. Hence it is considered reasonable<sup>9</sup> that alternatives appraisal should focus on this matter.
- 4.5 Whilst the plan is set to establish policy to address a range of other specific issues, it was recognised as reasonable and proportionate to develop policy without formal alternatives appraisal as they are not likely to result in significant effects.

<sup>&</sup>lt;sup>6</sup> https://www.blaenau-gwent.gov.uk/en/resident/planning/local-development-plan/local-development-plan-2018-2033/

<sup>&</sup>lt;sup>7</sup> There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. Whilst this report is not the SA Report, it is appropriate to present this information nonetheless for the benefit of stakeholders.

<sup>&</sup>lt;sup>8</sup> In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what 'reasonably' should be the focus of alternatives appraisal should be made in-light of the plan objectives. In the case of the South Somerset Local Plan Review, it is suggested that plan objective 1, which relate to meeting objectively assessed housing needs, is somewhat overarching.

<sup>&</sup>lt;sup>9</sup> Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

## Structure of this part of the report

- 4.6 This part of the report is structured as follows:
  - **Chapter 5** explains the context and work undertaken to develop reasonable alternatives at this stage;
  - Chapter 6 presents an appraisal of the reasonable alternatives; and
  - Chapter 7 explains reasons for selecting the preferred option.

## 5. Establishing the Reasonable Alternatives

#### Introduction

- 5.1 This chapter explains the evidence and work carried out at this stage to identify strategic options.
- 5.2 It is important to remember that options need to be genuine, reasonable, reflect the evidence and the plan, meet the evidenced needs of the area, be deliverable within the plan period, conform to national policy, complement regional or neighbourhood plans/ strategies, be flexible and sustainable.
- 5.3 This chapter is structured as follows:
  - Level of growth
  - Location of growth
  - Spatial strategy

## Levels of growth

5.4 Blaenau Gwent, Torfaen and Monmouthshire County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing and employment growth scenarios to inform the revised LDPs.<sup>10</sup> To date ten different scenarios have been prepared each with different outcomes in terms of population, dwellings and demographics. These have been grouped into three options of low, medium and high growth for the RLDP period (2018-2033). For each option a figure is given for the increase in the population, the number of new homes and the impact on the number of people in the workforce. The three options are set out in the table below.

#### Table 5.1: Growth options

Growth option	Level of housing and employment
Option 1 - Low growth (based on WG latest 2014 projections principal and 10 yr migration)	Population: loss of between 857 to 1,815 (-0.8% to 2.6% loss) Housing: 19 - 54 per annum (Total: 285 - 810) Employment: loss of 94 to 59 per annum (Total loss of 810 to 1,410 jobs)
Option 2 - Medium growth (based on 3 dwelling led projections (5,10 & 15 yr average) and Net nil migration)	Population: 162 to 690 gain (0.2 to 1% growth)  Housing: 79 - 94 per annum (Total 1,185 - 1,410)  Employment: loss of 52 to 36 per annum (Total loss of between 540 to 780 jobs)
Option 3 - High growth (based on PopGroup short term, long term, and long term adjusted)	<b>Population:</b> 1,996 to 5,009 gain (2.9% to 7.2% growth) <b>Housing:</b> 141 - 226 per annum (Total 2,115 - 3,390) <b>Employment:</b> -3 to 74 per annum (Total -45 to 1,110 jobs)

<sup>&</sup>lt;sup>10</sup> https://www.blaenau-gwent.gov.uk/en/resident/planning/local-development-plan/local-development-plan-2018-2033/

## Location of growth

- 5.5 The Council identified three potential high-level options for the distribution of growth during the plan period in the Spatial Strategy Options Briefing Paper (2019). These are as follows:
  - Option 1 (Current LDP) North (Ebbw Vale, Cwm, Tredegar, Trefil, Pochin, Bedwelty Pits and Brynmawr (including Nantyglo and Blaina)) / South (Abertillery (including Cwmtillery, Six Bells, Brynithel, Llanhileth and Aberbeeg) and Swfrydd) split with most of the growth in the north and with a focus of growth in Ebbw Vale;
  - Option 2 (Heads of the Valleys emphasis) North/ South split based on opportunities for growth along the Heads of the Valleys corridor; and
  - **Option 3 (Balanced growth)** Growth equally distributed across the borough based on the sustainability of settlement assessments.
- 5.6 To ensure that growth is distributed to the most sustainable settlements Welsh Government requires the assessment of the roles and function of settlements. The Welsh Government draft LDP Manual requires a clearly expressed settlement hierarchy is identified within the RLDP.
- 5.7 The current LDP assessed the role and function of settlements when preparing Holistic Action Regeneration Plans for Blaenau Gwent. In addition to this and as part of the RLDP evidence base the Council has carried out a sustainable settlement assessment. Each of the settlements have been assessed in terms of:
  - The level of sustainable transport and accessibility in and around settlements;
  - The availability of local facilities and services in and around settlements; and
  - The level of employment opportunities in and around settlements.
- 5.8 This is supported by contextual information in terms of size, and characteristics of the settlements. The Council identified two options, the first option is based on the current LDP hierarchy and the second is based on the settlement boundaries as identified in the current LDP. The two options are identified in the table below.

**Table 5.2: Settlement hierarchy options** 

Description	Settlement hierarchy
Option 1: Current LDP	Principal Hub: Ebbw Vale District Hubs: Tredegar Brynmawr Abertillery Local Hub: Blaina
Option 2: Based on Sustainable Assessment of Settlements (settlement boundaries used to identify settlements)	Tier 1: Principal Settlements  Ebbw Vale  Tredegar  Brynmawr / Nantyglo / Blaina  Abertillery /Cwmtillery / Six Bells / Brynithel / Llanhileth /Aberbeeg  Tier 2: Secondary Settlements  Cwm  Tier 3: Villages and Hamlets  Trefil  Pochin  Bedwellty Pits  Swfrydd

## **Spatial strategy options**

- 5.9 The Council merged the potential options for the level and location of growth to identify four realistic spatial strategy options. The first Option 1 (Growth and Regeneration) is based on the current LDP and involved a medium level of growth; with a north south divide and a focus of growth on Ebbw Vale; and a settlement hierarchy based on an analysis of the roles of towns (the current LDP).
- 5.10 Option 2 (Balanced and Interconnected Communities) involves a low level of growth; with equal distribution across the borough; and based on using the sustainable assessment of settlements to distribute this growth. Option 3 (Economic Growth Strategy) involves high growth; with a north south split based on opportunities for growth along the Heads of the Valleys; using the sustainable assessment of settlement to distribute the growth. Option 4 (Sustainable Economic Growth) is the same as option 3 but spread the growth equally across the Borough. The four options are set out in more detail in the table below.

**Table 5.3: Spatial strategy options** 

Name	Growth Level	Spatial Distribution	Settlement Hierarchy
Option 1: Growth and Regeneration (current LDP)	Option 2 Medium Growth Population: 162 to 690 gain (0.2 to 1% growth) Housing: 79-94 per annum Total 1,185-1,410 Employment: loss of 52 to 36 per annum (Total loss of between 540 to 780)	Option 1  North / South split with most of the growth in the north and with a focus of growth in Ebbw Vale	Option 1 Principal Hub: Ebbw Vale District Hubs: Tredegar/ Brynmawr/ Abertillery Local Hub: Blaina
Option 2: Balanced and Interconnected Communities	Option 1 Low Growth Population: Loss of 857 to 1,815 (-2.6 to -0.8% loss) Housing: 19-54 per annum (Total: 285-810) Employment: loss of 94 to 59 per annum (Total loss of – 810 to 1,410)	Option 2 Growth equally distributed across the borough based on sustainability of settlement assessment	Option 2 Tier 1: Principal Settlements Ebbw Vale/ Tredegar/ Brynmawr / Nantyglo / Blaina/ Abertillery / Cwmtillery / Six Bells / Brynithel / Llanhileth / Aberbeeg Tier 2: Secondary Settlements Cwm Tier 3: Hamlets Trefil/ Pochin/ Bedwellty Pits/ Swfrydd
Option 3: Economic Growth Strategy	Option 3 High Growth Population: 1,996 to 5,009 (2.9 to 7% growth) Housing: 141 to 226 per annum (Total 2,115 to 3,390) Employment: 74 per annum (Total -45 to plus 1,110)	Option 3  North / South split based on opportunities for growth along the Heads of the Valleys corridor	Option 2 Tier 1: Principal Settlements Ebbw Vale/ Tredegar/ Brynmawr / Nantyglo / Blaina/ Abertillery / Cwmtillery / Six Bells / Brynithel / Llanhileth / Aberbeeg Tier 2: Secondary Settlements Cwm Tier 3: Hamlets Trefil/ Pochin/ Bedwellty Pits/ Swfrydd
Option 4: Sustainable Economic Growth Strategy	Option 3 High Growth Population: 1,996 to 5,009 (2.9 to 7% growth) Housing: 141 to 226 per annum (Total 2,115 to 3,390) Employment: 74 per annum (Total - 45 to plus 1,110)	Option 2 Growth equally distributed across the borough based on sustainability of settlement assessment	Option 2 Tier 1: Principal Settlements Ebbw Vale/ Tredegar/ Brynmawr / Nantyglo / Blaina/ Abertillery / Cwmtillery / Six Bells / Brynithel / Llanhileth / Aberbeeg Tier 2: Secondary Settlements Cwm Tier 3: Hamlets

Name Growth Level

Spatial Distribution

**Settlement Hierarchy** 

Trefil/ Pochin/ Bedwellty Pits/ Swfrydd

## 6. Appraising the Reasonable Alternatives

#### Introduction

6.1 This chapter presents the summary findings of the appraisal of the strategic options.

#### **Method**

- The strategic options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in **Appendix III**.
- 6.3 For each of the strategic options, the assessment examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see **Table 3.1**) as a methodological framework.
- 6.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.5 It is important to note that effects are predicted taking into account the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of Blaenau Gwent County Borough Council).
- 6.6 Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2.

## Summary appraisal findings for strategic options

#### Level of growth

6.7 Each of the three options for the level of growth identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in Appendix III and summary findings provided below.

Table 6.1: Summary appraisal findings for growth level options

	Categorisation and rank			
Rank/ significant effect	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth	
Rank	3	2	1	
Significant effect?	Yes - Negative	No	Yes - Positive	
Rank	3	2	1	
Significant effect?	Uncertain	Yes - Positive	Yes - Positive	
Rank	2	1	1	
Significant effect?	Significant effect? Uncertain		Uncertain	
Rank	3	2	1	
Significant effect?	No	No	Yes - Positive	
Rank	=	=	=	
Significant effect?	No	No	No	
Rank	1	2	3	
Significant effect?	No	Uncertain	Uncertain	
Rank	=	=	=	
Significant effect?	No	No	No	
Rank	=	=	=	
Significant effect?	No	No	No	
Rank	=	=	=	
Significant effect?	No	No	No	
Rank	1	2	3	
Significant effect?	No	No	No	
	effect Rank Significant effect? Rank	Rank/ significant effectOption 1 - Low growthRank3Significant effect?Yes - NegativeRank3Significant effect?UncertainRank2Significant effect?UncertainRank3Significant effect?NoRank=Significant effect?NoRank1Significant effect?NoRank=Significant effect?NoRank=Significant effect?NoRank=Significant effect?NoRank=Significant effect?NoRank=Significant effect?NoRank=	Rank/ significant effectOption 1 - Low growthOption 2 - Medium growthRank32Significant effect?Yes - NegativeNoRank32Significant effect?UncertainYes - PositiveRank21Significant effect?UncertainUncertainRank32Significant effect?NoNoRank==Significant effect?NoNoRank12Significant effect?NoUncertainRank==Significant effect?NoNoRank==Significant effect?NoNoRank==Significant effect?NoNoRank==Significant effect?NoNoRank==Significant effect?NoNoRank12	

- 6.8 For ISA themes relating to transport, biodiversity, the landscape and historic environment the nature and significant effects will be dependent on where the additional growth is located and how development is designed/ implemented. There is no evidence at this stage to suggest that the additional growth proposed under Options 2 and 3 would result in a significant negative effect on these themes as long as the development is located away from sensitive receptors and/ or suitable mitigation is provided.
- 6.9 The higher growth options (2 and 3) are identified as performing better against ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County Borough. The appraisal identified the potential for a residual long term significant positive effect for Option 3 on the population and communities, economy and employment and the equalities theme. Option 2 was also identified as having the potential for a long term significant positive effect on the population and communities theme. Option 1 is less likely to

- have a residual significant positive effect on these themes as it would only provide a small level of additional growth beyond what is already committed or likely to come forward as windfall during the replacement LDP plan period. It is therefore less likely to deliver a diverse range of new homes, employment opportunities or community infrastructure. The predicted loss in jobs coupled with the low level of housing growth proposed under Option 1 has the potential for a significant long term negative effect in relation to the economy and employment ISA theme.
- 6.10 The appraisal found that as the level of growth increases so does the likelihood for negative impacts on natural resources and climate change through the potential increased loss of greenfield/ agricultural land and mineral resources as well as increased carbon emissions. Options 2 and 3 are predicted to have an uncertain effect against the natural resources theme at this stage as the precise location of development is not known. If development is primarily delivered on greenfield land and important mineral resources then a residual negative effect is likely, with the significance of this effect increasing as the level of growth increases. If the majority of growth can be delivered on brownfield land then there is the potential for a positive effect.

#### **Location of growth**

6.11 Each of the three options for the location of growth identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in Appendix III and summary findings provided below.

Table 6.2: Summary appraisal findings for distribution options

		Categorisation and rank			
ISA Themes	Rank/ significant effect	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth	
Economy and	Rank	1	1	2	
Employment	Significant effect?	No	No	No	
Population and	Rank	1	2	3	
Communities	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	
	Rank	1	2	3	
Health and wellbeing	Significant effect?	No	No	No	
Equalities, diversity and	Rank	1	2	3	
social inclusion	Significant effect?	No	No	No	
	Rank	1	2	3	
Fransport and movement	Significant effect?	No	No	No	
determination of the second of	Rank	=	=	=	
Natural Resources	Significant effect?	No	No	No	
Biodiversity and geodiversity	Rank	2	2	1	
	Significant effect?	Uncertain	Uncertain	No	
	Rank	=	=	=	
Historic Environment	Significant effect?	No	No	No	
	Rank	1	1	2	
_andscape	Significant effect?	No	No	No	
···	Rank	3	2	1	
Climate Change	Significant effect?	Uncertain	Uncertain	Uncertain	

- 6.12 The appraisal found that there is little to differentiate between the Options at this stage with regard to the historic environment and natural resources ISA themes. This is given that all Options have the potential for impacts through directing development to areas that are sensitive in terms of heritage, air, land, mineral and water constraints; albeit in different areas of the County Borough. Development also has the potential to deliver positive effects through mitigation and environmental improvement/ enhancement measures secured at the project scale. While significant negative effects are not anticipated for any of the options this will ultimately be dependent on the precise location and the design/ layout of development.
- 6.13 In terms of the landscape theme, Options 1 and 2 direct development to more urban areas in the north of the County Borough, that are less sensitive in landscape terms than the south. Option 3 distributes growth evenly throughout the County Borough and is therefore more likely to impact upon key views and visual amenity of the south. Option 3 is therefore worst performing in this respect. Conversely, Option 3 is best performing in terms of the biodiversity ISA theme, given dispersed growth will avoid concentrating growth in close proximity to sensitive biodiversity designations; notably avoiding the European and nationally designated biodiversity sites to the north east of Blaenau Gwent. However, while Options 1 and 2 are considered more likely to lead to negative effects on designated biodiversity sites in the north, these Options (notably Option 1) may offer increased opportunity to deliver larger scale development with greater potential to deliver strategic green infrastructure, including the potential for achieving a net gain in biodiversity at a greater scale. However, this is uncertain at this stage.
- 6.14 Option 1 is best performing against ISA themes relating to communities, health, economy, transport, and equalities, followed by Option 2, with Option 3 identified as worst performing. Positive effects of greatest significance are predicted through Option 1 as a result of focussing more growth at the principal hub of Ebbw Vale, where there is better access to existing employment and facilities/ services, and an opportunity to deliver large-scale regeneration. This will help to reduce reliance on the private vehicle, encourage a modal shift and support connected, sustainable communities.
- 6.15 Option 2 also directs growth to the Heads of the Valleys, with less emphasis on Ebbw Vale. Option 2 therefore performs less positively than Option 1 as it would result in a higher level of growth at lower order settlements across the Heads of the Valleys, reducing opportunities to capitalise upon strategic regeneration at Ebbw Vale. However, Option 2 will lead to positive effects through providing opportunity for greater regeneration at the other settlements (not Ebbw Vale) in the north. This will lead to improved connectivity and integration across the Heads of the Valleys, addressing key issues such as housing affordability and deprivation.
- 6.16 Option 3 performs less well given there is generally poorer access to sustainable transport, employment opportunities and facilities/ services in the wider County Borough. However, it is recognised that there is a train station in Llanhilleth and a proposed extension of the Ebbw Vale railway line to Abertillery through the Metro project. Delivering balanced growth is nonetheless likely to encourage the trend of private vehicle use and could impact upon the more vulnerable and less mobile members of the community, such as the elderly. While Option 3 would deliver a level of growth to rural communities to the south and contribute towards meeting local needs, it is considered that this Option would be less likely to deliver larger scale growth and therefore provide the critical mass to deliver greater infrastructure improvements. This may lead to exacerbated demographic issues and increased levels of out-commuting. It is also recognised that the south has fewer opportunities for development given the topographical constraints present.
- 6.17 Option 3 is identified as performing better than Options 1 and 2 in terms of the climate change theme as it directs less growth to areas identified as having high flood risk. However, it is recognised that all new development will accord with Technical Advice Note 15: Development and Flood risk (2004), which sets out a precautionary framework to direct new development away from those areas which are at high risk of flooding. To this effect, in accordance with national policy, information will need to be provided to demonstrate that any development proposal satisfies the tests contained in the TAN.

6.18 It should be noted that it was not considered necessary to carry out an appraisal of the settlement hierarchy options identified in Chapter 5. A detailed assessment was carried out by the Council on the current role and function of settlements, which also took into consideration the relationships between settlements and their potential future roles. The likely significant effects of focusing growth at different areas within the County Borough have been explored through the appraisal of distribution options above and spatial strategy options below.

#### Spatial strategy

6.19 Each of the four spatial strategy options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme. The detailed findings are presented in Appendix III and summary findings provided below.

Table 6.3: Summary appraisal findings for the spatial strategy options

		Categorisation and rank			
ISA Themes	Rank/ Significant effects	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Economy and Employment	Rank	2	3	1	1
	Significant effect?	Uncertain	Yes - Negative	Yes - Positive	Yes - Positive
Population and Communities	Rank	2	3	1	1
	Significant effect?	No	Yes - Negative	Yes - Positive	Yes - Positive
Health and wellbeing	Rank	3	4	1	2
	Significant effect?	Uncertain	No	Yes - Positive	Uncertain
Equalities, diversity and social inclusion	Rank	2	3	1	2
	Significant effect?	Yes - Positive	No	Yes - Positive	Yes - Positive
Transport and movement	Rank	2	4	1	3
	Significant effect?	Uncertain	No	Yes - Positive	Uncertain
Natural Resources	Rank	1	1	2	2
	Significant effect?	No	No	Uncertain	Uncertain
Biodiversity and geodiversity	Rank	2	1	4	3
	Significant effect?	No	No	Uncertain	No
Historic Environment	Rank	2	1	4	3
	Significant effect?	No	No	Uncertain	Uncertain
Landscape	Rank	1	1	2	3
	Significant effect?	No	No	No	Uncertain
Climate Change	Rank	2	1	3	3
	Significant effect?	No	No	No	No

6.20 Options 3 and 4 are considered to perform better compared to Options 1 and 2 against ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities, diversity and social inclusion. They propose a higher level of housing and employment growth and are therefore more likely to meet the needs of the borough. They are also more likely to deliver greater improvements to community infrastructure and the public realm. The delivery of new homes, employment opportunities and associated infrastructure can help to address deprivation and reduce social exclusion. As a result, they are identified as having the potential for a significant long term positive effects against themes relating to the economy/ employment, population/ communities and equalities/ diversity/ social inclusion

- themes. Option 2 performs less well against these ISA themes as it proposes the lowest level of growth and is unlikely to meet the needs of communities. It is therefore identified as having the potential for a significant long term negative effect against the economy and employment and population and communities themes.
- 6.21 Options 3 and 4 generally perform more poorly against ISA themes relating to biodiversity, historic environment, landscape, natural resources and climate change. The higher levels of growth increase the likelihood of impacts and therefore negative effects; however, this is dependent on the location of development. Option 3 is identified as being most likely to result in impacts to sensitive biodiversity and historic environment receptors in the north of the borough. While Option 1 proposes a similar distribution of development it proposes a lower overall level of growth and is therefore less likely to have negative effects. Option 4 is more likely to have impacts on the sensitive landscape in the south of the borough.
- 6.22 In terms of transport and movement, Option 3 is considered to perform best at this stage and is identified as likely to have a significant long term positive effect. It delivers a higher level of growth and focuses it (new homes, jobs and community infrastructure) at the higher order settlements in the north of the borough with good access to public transport. While Option 1 proposes a similar distribution of development with a greater focus on Ebbw Vale, it also proposes a lower level of growth and would not deliver the same level of employment opportunities or community infrastructure improvements compared to Option 3. Options 4 and in particular Option 2 perform less well as they propose distributing growth equally across the borough, which would include lower order settlements and rural areas. This will not help to reduce the need to travel or encourage the use of more sustainable transport modes.

## 7. Developing the Preferred Strategy

#### Introduction

This Chapter presents the Council's response to the alternatives appraisal and the Council's reasons for selecting its preferred approach in light of alternatives appraisal and other factors.

## The Council's outline reasons for choosing the preferred strategy

It should be noted that the Council's reasons for identifying the preferred strategy are presented in the Growth Options and the Spatial Strategy Options Background Papers. The outline reasons are set out below.

#### Level of growth

Table 7.1: Outline reasons for choosing preferred growth option

#### **Options (type) Outline reasons**

#### **Low Growth Options**

(Demographic) WG 2014based Principal

Planning Policy Wales (PPW) Edition 10 (December 2018) states that the latest Welsh Government local authority level household Projection for Wales should be considered. The latest available projections, the 2014-based projections, were used and this scenario is based on the Principal projection. Using this scenario as the growth strategy for the RLDP would result in a negative population growth and would adversely impact upon the Council's challenges for economic and housing growth. The combination of the decrease in the population of the workforce cohorts and an increase in the 60+ age cohort would not drive job creation; rather it would result in an outflow of workers and residents from the County Borough. This would result in implications in terms of keeping younger people within the County Borough to live and work. The unbalanced demographic and lack of opportunities would impact on the ability of the County Borough to build sustainable communities.

(Demographic) WG 10 year migration

As with the above option the 2014-based projections, were used and this scenario is based on the 10 year migration projection. Similarly, using this scenario as the growth strategy for the RLDP would result in a negative population growth and would adversely impact upon the Council's challenges of economic and housing growth. The combination of the decrease in the population of the workforce cohorts and an increase in the 60+ age cohort would not drive job creation; rather it would result in an outflow of workers and residents from the County Borough. This would result in implications in terms of keeping younger people within the County to live and work. The unbalanced demographic and lack of opportunities would impact on the ability of the County Borough to build sustainable communities.

**OE** Baseline

(Demographic) The Oxford Econometrics 'Baseline' economic forecast was based on a similar projection to that presented in the WG 2014 (Principal) scenario. As with the previous scenarios, using this scenario as the growth strategy for the RLDP would result in a negative population growth and adversely impact upon the Council's challenges of economic and housing growth. The combination of the decrease in the population of the workforce cohorts and an increase in the 60+ age cohort would not drive job creation; rather it would result in an outflow of workers and residents from the County Borough. This would result in implications in terms of keeping younger people within the County Borough to live and work. The unbalanced demographic and lack of opportunities would impact on the ability of the County Borough to build sustainable communities.

#### **Mid Growth Options**

29% of stakeholders supported the mid growth options.

(Dwelling) Dwelling-led 5 year average

This option represents 'business as usual', i.e. maintaining the past average 5-year build rate. This would result in a continuation of the trend towards an ageing demographic, albeit with a small population growth (0.2%). Adopting this scenario as the growth strategy for the RLDP would fail to address the challenges from both an economic and social perspective. The combination of the decrease in the population of sections of the workforce cohorts and an increase in the 60+ age cohort would not drive significant job creation. This would again result in implications in terms of keeping younger people within the County Borough to live and work. The unbalanced demographic and lack of opportunities would impact on the ability of the County Borough to build sustainable communities.

#### (Demographic) Net Nil Migration

The latest available projections, the 2014-based projections, were used and this scenario is based on the Net Nil Migration projection. Using this scenario as the growth strategy for the RLDP would result in a 'business as usual' and would not support the Council's challenges of economic and housing growth. Though there would be a small increase in the population (0.3%) there would be a decrease in the population of the workforce cohorts and an increase in the 60+ age cohort would not drive job creation; rather it would result in an outflow of workers and residents from the County Borough. This would result in implications in terms of keeping younger people within the County Borough to live and work. The unbalanced demographic and limited economic opportunities would impact on the ability of the County Borough to build sustainable communities.

#### (Dwelling) Dwelling-led 10 year average

This option represents 'business as usual', that is maintaining the past average 10-year build rate, a continuation of the trend towards an ageing demographic, albeit with a small uplift in the population (1%). As with the previous scenario, adopting this scenario as the growth strategy for the RLDP would fail to address the challenges from both an economic and social perspective. The combination of the decrease in the population of sections of the workforce cohorts and an increase in the 60+ age cohort would not drive significant job creation; rather it would continue to result in an outflow of workers and residents from the County Borough. This would again result in implications in terms of keeping younger people within the County Borough to live and work. The unbalanced demographic and limited opportunities would impact on the ability of the County Borough to build sustainable communities.

#### (Dwelling) Dwelling-led 15 year average

This option represents 'business as usual', that is maintaining the past average 15-year build rate, a continuation of the trend towards an ageing demographic, albeit with a small increase (1.2%) in the population. As with the previous scenario, adopting this scenario as the growth strategy for the RLDP would fail to address the challenges from both an economic and social perspective. The combination of the decrease in the population of sections of the workforce cohorts and an increase in the 60+ age cohort would not drive significant job creation; rather it would continue to result in an outflow of workers and residents from the County Borough This would again result in implications in terms of keeping younger people within the County Borough to live and work. The unbalanced demographic and lack of opportunities would impact on the ability of the County to build sustainable communities. In view of these negative impacts it is not considered prudent to take this forward as the preferred growth option.

#### **High Growth Options**

Stakeholder generally supported the high growth options (71%)

(Demographic) This option results in a reasonable level of growth (2.9%) in the County Borough's population and PG Short Term also an uplift on the current dwelling delivery levels. This scenario results in a small decrease in the working age population. Though when consideration is given to plans to reduce the unemployment rate, increase the employment rate and reducing commuting rates the impacts on the economy are positive. This demographic-led scenario could result in an undeliverable growth strategy for the County Borough.

## PG Long Term

(Demographic) This option results in fairly significant growth in the County Borough's population (4.9%) and also an uplift on the current dwelling delivery levels. The scenario results in an uplift in the working age population and the 0-14 age group. This demographic-led scenario would be ambitious in driving economic aspirations but could result in an undeliverable and unsustainable growth strategy for the County Borough.

#### (Demographic) PG Long Term (adjusted)

This option results in significant growth in the County Borough's population (7.9%) and also an uplift on the current dwelling delivery levels. The scenario results in an uplift in the working age population and the 0-14 age group. The assumptions behind this option take account of the removal of the Severn Bridge Tolls, however whilst it is likely that this will increase in-migration to the County Borough it is still unclear how much of an uplift will result from this change. This demographic-led scenario would be ambitious in driving economic aspirations but will result in an undeliverable and unsustainable growth for the County Borough.

#### (Dwelling) Dwelling Led -120

This option was newly introduced to address concerns with the ability to deliver the high growth options. It represents an improvement on past trends but is slightly lower than the high growth options initially considered. This option results in a reasonable level of growth (2.1%) in the County Borough's population and also an uplift on the current dwelling delivery levels. This scenario results in a small decrease in the working age population. Though when consideration is given to plans to reduce the unemployment rate, increase the employment rate and reducing commuting rates the impacts on the economy are positive. This scenario is considered to be deliverable.

7.3 It is clear from the analysis that although there was significant support for the high growth options during stakeholder involvement and they performed well against the LDP challenges set, they were considered to be undeliverable. Whilst the lower of the high growth options is taken forward as the aspirational level of growth, a new scenario was run based on a dwelling-led figure of 120 in order to ensure a population growth that was deliverable. Economic growth is to be delivered through reducing the unemployment rate, increasing the employment rate and reducing out-commuting rates. Together, these changes will have positive impacts on the economy.

#### **Distribution of growth**

#### Options (type) Outline reasons

Option 1: Current LDP – Based on a north south divide with the main focus of growth on Ebbw Vale It is considered that the existing LDP Strategy is not working, as demonstrated in the LDP Annual Monitoring Reports. The level of growth has not been delivered and the shift to Ebbw Vale has yet to materialise due to a delay in bringing forward the two Strategic Sites. The focus on Ebbw Vale is considered to detract from the challenge to create a network of valley communities. Too much focus on Ebbw Vale would also put pressure on services. The current LDP used the role and function of settlements to identify the settlement hierarchy with Ebbw Vale as the principal hub for the area.

Option 2: Heads of the Valleys emphasis

This option provides the ability to build on the opportunities along the Heads of the Valleys settlements. However this could be viewed as a road based strategy that is not a sustainable strategy.

The growth is to be distributed based on the sustainability assessment of settlements though with a focus of growth on the Heads of the Valley settlements.

Only a limited number of stakeholders (7%) supported the current LDP Option.

Almost a third of stakeholders supported this Option.

Option 3: Balanced Growth This option proposed growth to be equally distributed across the Borough settlements. This supported the plan's vision to create a network of vibrant valley communities. It could maximise plans to improve connectivity through the Metro proposals and could therefore support sustainable transport options.

The growth is to be distributed based on the sustainability assessment of settlements.

The majority of stakeholders (63%) supported this option.

7.4 It is clear from the analysis of the spatial options that Option 3 was the favoured option and would support the vision identified for the Plan.

#### **Spatial strategy options**

7.5 The growth and spatial strategy options were combined to create a number of options. Initially three options were created, with an additional option added following consultation with Members.

#### Options (type) Outline reasons

Option 1: Growth and Regeneration (current LDP) This option combined a medium level of growth with the LDP spatial distribution of a north south divide with a focus of growth on Ebbw Vale.

The medium level of growth meant that it was less likely to deliver large scale growth and associated improvements.

Its spatial strategy performed well in terms of national strategies, wider strategies, aspirations of the plan, availability and suitability of brownfield land, location of market housing, deliverability, accessibility to employment, minimising the need to travel and environmental implications. Overall it was the level of growth and focus on Ebbw Vale which led it to being ruled out as the preferred strategy.

Option 2: Balanced and Interconnected Communities

This option combined a low level of growth with a dispersal strategy.

This strategy performed well in terms of decarbonisation and environmental implications. Though its low level of growth and dispersal strategy meant that it did not deliver on wider strategies, aspirations of the plan, brownfield land, location of market and affordable housing, viability, accessibility to employment and minimising the need to travel.

Options (type)	Outline reasons
	The level of growth together with its dispersal strategy meant that it performed poorly and led to it being ruled out as the preferred strategy.
Option 3: Economic Growth	This option combined a high level of growth with a focus on the Heads of the Valleys settlements. This strategy performed well in terms of wider strategies, aspirations of the plan, availability of brownfield sites, and accessibility to employment. However, it performed poorly in terms of decarbonisation, deliverability, minimising the need to travel and environmental implications. Though the level of growth meant that it performed well in some areas it also led to a negative impact in other areas. Similarly the focus on the Heads of the Valleys settlements had a mixed impact. This led to it being ruled out as a preferred strategy.
Option 4: Sustainable Economic Growth	This option combined a high level of growth with a dispersal strategy.  This strategy performed well in terms of meeting the wider needs of the population.  However, it performed poorly in terms of decarbonisation, wider strategies, aspirations of the plan, availability of brownfield sites, accessibility to employment, deliverability, minimising the need to travel and environmental implications.  Though the level of growth and spatial distribution were supported by stakeholders weaknesses in the strategy were later identified.

7.6 Following consultation with Welsh Government on the above spatial strategy options an amended option was created to address concerns and weaknesses identified by the assessment:

#### Options (type) Outline reasons

#### Option 5 Sustainable Economic Growth

Concerns with the deliverability of the level of growth and the sustainable assessment of settlements led to changes to the Sustainable Economic Growth Strategy Option.

The lower end of the high growth option was taken forward as the aspirational growth level and a new dwelling led figure was identified for the housing requirement figure. Changes to the settlement hierarchy means that growth is now more focussed on the most sustainable settlements.

The strategy performs reasonable in terms of national strategies, environmental implications and social and cultural factors.

The strategy performs well in terms of wider strategies, aspirations of the plan, brownfield land, deliverability, accessibility to employment, minimise the need to travel.

Overall this strategy is considered to perform well, it is also based on the strategy favoured by stakeholders.

# Part 2: What are the ISA findings at this stage?

## 8. Introduction (to Part 2)

8.1 The aim of this chapter is to present an appraisal of the replacement LDP, as currently presented in the Pre-Deposit Document.

## Methodology

- 8.2 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ISA objectives identified through scoping (see **Table 3.1**) as a methodological framework. In total, there are ten ISA themes as follows:
  - Economy and employment;
  - Population and communities;
  - Health and wellbeing;
  - Equalities, diversity and social inclusion;
  - Transport and movement;
  - Natural resources (air, land, minerals and water);
  - Biodiversity and geodiversity;
  - Historic environment;
  - Landscape; and
  - Climate change.
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/ accessibility).

<sup>&</sup>lt;sup>11</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 9. Appraisal of the Preferred Strategy

#### Introduction

9.1 As introduced above, the aim of this chapter is to present an appraisal of the Preferred Strategy under the ISA themes/ framework. A commentary on the spatial strategy is provided as well as an appraisal of the Preferred Strategy as a whole and finally a commentary on cumulative effects; for each of the 10 ISA themes.

## **Economy and employment**

#### Appraisal of the Preferred Strategy

- 9.2 Strategic Policy 1 (Sustainable Economic Growth) proposes the delivery 3-46 ha of new employment land to enable the provision of at least 1,500 and an aspiration for 3,375 new jobs during the plan period. This is balanced alongside the delivery of 2,115 new homes during the plan period. The new homes will be distributed across the borough in line with the settlement hierarchy with 45% all of the homes being directed to the Primary Settlement, 50% to Main Settlements and 5% to Secondary Settlements, Villages and Hamlets.
- 9.3 16.7 ha of the new employment land will be delivered at the strategic mixed-use sites, comprised of 3.5 ha at The Works in Ebbw Vale and 13.2 ha in the Ebbw Vale Northern Corridor. While the Preferred Strategy does not indicate where the remaining 29.3 ha will be delivered; it is assumed it will be distributed in line with the settlement hierarchy with the majority directed towards the Primary (Ebbw Vale) and Main (Tredegar, Brynmawr/ Nantyglo/ Blaina and Abertillery) settlements alongside the new residential development. Focussing the delivery of new large scale employment land and housing at Ebbw vale through the strategic mixed-use sites takes advantage of the public transport infrastructure available, in particular Ebbw Vale Town and Ebbw Vale Parkway rail stations. While new employment land and residential development will be delivered in Tredegar and Brynmawr, it will be important for the RLDP to seek opportunities to improve bus links into Ebbw Vale and the new employment land being delivered at the strategic mixed-use sites.
- 9.4 Strategic Policies 4 (Employment and Skills) and 8 (Delivery of Homes) provide further detail in terms of the delivery of new employment land and housing during the plan period. Strategic Policy 4 states that opportunities for sustainable economic growth will be delivered by directing employment generating development to the most appropriate and sustainable locations, supporting expansion of existing businesses and ensuring spatial alignment between housing and employment growth. Alongside the delivery of 3-46 ha of new employment land during the plan period and retaining/ safeguarding two strategic sites for employment purposes (The Works and Ebbw Vale Northern Corridor), the policy also supports the development of land close to the proposed Metro station at Abertillery. This will have a long term positive effect by improving access to employment opportunities within Abertillery as well as more widely in the County Borough and beyond through the new railway line extension scheduled for completion in 2020.
- 9.5 Strategic Policy 8 (Delivery of Homes) provides more detail in terms of the delivery of new homes during the plan period. This will have indirect positive effects on the economy by helping to ensure that there are new homes, including at least 478 affordable homes, for economically active people in the County Borough. These homes are being delivered alongside new employment land at the strategic mixed-use sites and focussed in the Primary and Main settlements where there are greater opportunities to access employment opportunities through sustainable transport modes.
- 9.6 The delivery of new employment land and homes during the plan period does not necessarily equate to significant positive effects on the economy and employment theme. The Blaenau Gwent economy has experienced major structural change moving from dependence on heavy industries that historically dominated the local economy. The challenge is to provide land that is attractive to investment in job sectors (new technologies and advanced manufacturing, IT and

cyber security, tourism and low carbon sustainable technologies) with good growth prospects while also ensuring that people have the right skills for these jobs. With this in mind, Strategic Policy 4 (Employment and Skills) seeks to put in place the infrastructure required to ensure that residents gain the skills they require to match these economic growth sectors. It also seeks the negotiation of local labour market agreements with developers to enable local employment to secure employment and skills development. The supporting text states that the RLDP should contribute to the improvement of the education and skills infrastructure through where appropriate securing through S106 agreements skills and training match the economic growth sectors and supporting infrastructure provision. Furthermore, Strategic Policy 4 (Employment and Skills) states that the employment roles of major industrial areas will be identified to assist in the diversification of employment and support growth sectors.

- 9.7 Depending on the precise location of the residential development proposed under Strategic Policy 1 (Sustainable Economic Growth) and 8 (Delivery of Homes), new homes should help to support and improve the vitality of existing town centres, which will have a positive effect on the local economy. Any opportunities to improve access to existing town centres by sustainable modes of transport should be explored.
- 9.8 Strategic Policy 10 (Retail Centres and Development) states that the current retail hierarchy will be reviewed and a new hierarchy identified to inform the Deposit Plan based on evidence from a Retail Study. To support and sustain the town centres in the Primary and Main settlements the policy supports exploring new roles for them. Exploring complimentary or expanded roles for the town centres will have a positive effect for the local economy. Strategic Policy 10 (Retail Centres and Development) also supports the refurbishment and redevelopment of shops, office and other commercial premises and making land available to accommodate future local retailing need where appropriate. It also seeks opportunities to improve access to, and within, retail and commercial centres by all modes of transport. This will all have a long term minor positive effect on the local economy.
- 9.9 Strategic Policy 2 (Sustainable Placemaking and Design) ensures that development delivers inclusive design that offers choice and access for all and is integrated with wider public transport routes and active travel routes. This is likely to have an indirect minor long term positive effect on the economy and employment by improving access to new employment opportunities and the existing town centres. Strategic Policy 11 (Sustainable Transport and Accessibility) also seeks to improve sustainable access to employment, local services and community facilities by locating development so that it minimises travel and reduces dependency on the private car.
- 9.10 Strategic Policy 5 (Growing Tourism) has the potential for a positive effect on the economy and employment theme as it supports a growing tourism economy through delivery of major destination attractions, high quality accommodation/ venues/ businesses/ events/ attractions/ cultural tourism/ rural enterprise/ activity tourism and the establishment of the Valleys Regional Park. The significance of the effect is uncertain at this stage as it is dependent on specific proposals coming forward and the effective implementation of the Valleys Regional Park.
- 9.11 Strategic Policies 13 (Protection and Enhancement of the Natural Environment), 14 (Preservation and Enhancement of the Built Environment) and 15 (Environmental Protection) also support the tourism economy. They seek to protect and where possible enhance the natural and built environment, which could have indirect minor positive effects by protecting/enhancing areas/ features that contribute to the visitor economy, such as the Blaenavon World Heritage Site and Valleys Regional Park.
- 9.12 Other policies also have the potential for an indirect minor positive effect on the local economy. This includes Strategic Policy 12 (Social and Community Infrastructure) which supports improved mobile phone coverage. This has the potential for an indirect positive effect for the local economy, in particular the rural economy. It also states that land for new schools will be provided where required, which is positive in terms of educational attainment and improved skills. It is recommended that the policy should also include support for wider digital infrastructure, including improved fibre broadband coverage and speeds.
- 9.13 Strategic Policy 6 (Sustainable Minerals Management) has the potential for a minor long term positive effect on the economy as it seeks to maintain a minimum 10 year land bank of

- permitted aggregate reserves throughout the plan period and also safeguards areas underlain by non-energy minerals of economic importance where they could be worked in the future.
- 9.14 The other Strategic Policies not directly referred to above are all likely to have a neutral effect on the economy and employment theme.

#### **Summary Appraisal of the Preferred Strategy**

- 9.15 The Preferred Strategy proposes the delivery of new employment land and homes to meet identified needs and provide flexibility during the plan period. Growth is being distributed according to the settlement hierarchy with the majority of development directed towards the higher tier settlements where there is greater need and better access to sustainable transport modes and wider infrastructure. The Preferred Strategy takes advantage of the proposed railway line extension to Abertillery and any opportunities to improve sustainable transport links to new and existing employment areas should be explored. Alongside supporting the development of new employment in job growth sectors (new technologies and advanced manufacturing, IT and cyber security, tourism, low carbon sustainable technologies and the foundation economy) it will be vitally important to support and enhance education and skills related infrastructure in these areas to ensure that people have the right skills for these roles.
- 9.16 Overall, the Preferred Strategy is predicted to have a significant long term positive effect on the economy and employment theme. It supports the growth aspirations of the Council as well as taking advantage of opportunities arising from the Cardiff City Deal, Valleys Task Force, Tech Valleys, Enterprise Zone and Metro proposals. As a result, it should help to increase the activity rate, reduce economic inactivity and reduce out-commuting of the current population.

#### **Appraisal of cumulative effects**

- 9.17 The Cardiff City Deal identifies regional economic challenges and opportunities for the ten authorities which comprise the Cardiff City Region. Addressing economic challenges and maximising opportunities are right at the heart of the rationale behind the City Deal and there is likely to be significant potential for positive cumulative effects in relation to economy and employment in this context.
- 9.18 The spatial strategy seeks to maximise opportunities arising from the City Deal, Valleys Task Force, Tech Valleys, Enterprise Zone and Metro proposals. In the context of Blaenau Gwent's strategic location on the Heads of the Valleys Road corridor, which links a number of key settlements and employment sites in the north of the Cardiff Capital Region, there is potential for cumulative effects from development in surrounding plan areas. This is likely to be particularly in relation to development proposals east of Blaenau Gwent in Monmouthshire and to the west in Caerphilly and Merthyr County Boroughs.
- 9.19 The proposed allocation of new employment floorspace at Rhyd-y-Blew in the Ebbw Vale Enterprise Zone is likely to feed into a pattern of regional employment growth evident from development allocations proposed through the Merthyr Replacement LDP (at land east of Goat Mill Road and land east of the A4060) as well as existing key employment sites at Merthyr and at Rhymney. It is considered that cumulative positive effects are likely in relation to economy and employment from growth at the Ebbw Vale Enterprise Zone and growth along the Heads of the Valleys corridor as this will continue to support and grow the regional economy.
  - Housing and employment growth planned in the neighbouring authorities through adopted LDPs/ emerging revised LDPs, including Torfaen, Monmouthshire, Caerphilly, Powys and Brecon Beacons National Park, has the potential to interact with development proposed through the Preferred Strategy. In terms of the economy and employment theme cumulative effects are most likely to be positive through the delivery of new employment opportunities in job growth sectors that are focussed where possible in sustainable locations. A key challenge across the region will be to try and coordinate improvements to education and skills related infrastructure in job growth areas to ensure that people have the right skills for these new roles. Helping to deliver the long term aspiration to lower unemployment rates, increase economic activity and decrease out-commuting.

## **Population and communities**

#### **Appraisal of the Preferred Strategy**

- 9.20 The population and communities ISA theme has the dual objective of providing a sufficient quantity of good quality homes in sustainable locations and enhancing design quality to "create great places". A key aspect of the provision of new homes is that a suitable mix of housing types and tenures is achieved to enable different groups within the community to access high quality housing.
- 9.21 Historically, the population in Blaenau Gwent has fallen over the last century, though recently the rate of decline has been more stable, falling by just 3.4% in the 20 year period between the 1991 Census and 2011 Census. The latest Welsh Government housing projections indicate that the number of households in south east Wales will increase by 8.4% (46,500) between 2018 and 2033. Blaenau Gwent will have to accommodate a share of this growth as it falls within a National Growth Area identified in the draft NDF (August 2019) and to fulfil its regional obligations as part of the Cardiff Capital Region.
- 9.22 Through Strategic Policy SP1 (Sustainable Economic Growth) the Preferred Strategy identifies a housing need of 1,755 new homes over the plan period, though proposes a total delivery of 2,115 homes to incorporate a suitable buffer which allows for factors such as potential changes to site availability. Of this total, at least 478 homes will be affordable, subject to viability. Since the plan base date in 2018 the number of completions, commitments and windfall contributions from small and large sites totals 1,282 homes, leaving 833 homes to be allocated in the Plan.
- 9.23 Conceptual spatial choices in Blaenau Gwent are relatively limited by the County's distinctive 'ridge and furrow' topography which is typical of the South Wales Valleys. This is reflected in the historic pattern and form of the County's settlements and suggests that the broad distribution of growth will likely continue to follow established historical patterns. In this context the Preferred Strategy directs 45% of growth to Ebbw Vale as the County's main settlement. The three Tier 2 settlements of Tredegar, Brynmawr/Nantyglo and Blaina and Abertillery (including Cwmtillery and Six Bells) are proposed to deliver 50% of growth in total. The smaller settlements at Tiers 3, 4 and 5 are proposed to deliver just 5% of growth between them in total.
- 9.24 In order to offer some certainty as to where development is proposed to take place, Strategic Mixed-Use Sites are identified, i.e. sites of over 100 homes. These Sites have been taken through the Candidate Site Assessment Process and judged to be suitable for development. These sites have sufficient evidence of viability and deliverability and will collectively deliver a very significant proportion of both residential and employment growth in the County. These comprise The Works site in central Ebbw Vale, the Northern Ebbw Vale corridor comprising land at Rhyd y Blew and Bryn Serth plus the site of the former comprehensive school at Nantyglo.
- 9.25 Although Blaenau Gwent has among the lowest average house prices in Wales, access to affordable housing remains an issue in the context of low paid employment options. The Preferred Strategy proposes delivery of at least 478 affordable homes over the plan period. The location of new development is therefore an important consideration in terms of reaching the development needs of all housing areas, and maximising accessibility to community services and facilities, as well as existing transport infrastructure and employment opportunities.
- 9.26 Focussing growth at the largest settlements also has the benefit of enabling the delivery of new or enhanced community facilities at the locations where they will be of benefit to and be closest to the largest proportion of residents, whilst also ensuring existing facilities are accessible to new development.
- 9.27 A number of strategic policies seek to ensure that new development is delivered at sustainable locations or that locations are made more sustainable through the development process via the provision of new infrastructure and facilities. The key housing policy is Strategic Policy 8 (Delivery of Housing). In addition to re-affirming the distribution of housing growth between settlements, the policy sets a clear priority for delivering housing on brownfield sites within

- existing settlements and brownfield land at the edge of settlements. This will help ensure that new housing growth takes place at the locations best served by existing services and is therefore consistent with the ISA objective to provide homes in sustainable locations.
- 9.28 Additionally, Strategic Policy 8 recognises the importance of bringing development forward via a mixture of providers, including through small sites. Small sites can make a significant contribution to the timely delivery of new homes as they often have much shorter lead times than strategic sites, meaning new homes can potentially come online much more quickly. To this end the policy states that "a range of sizes of sites will be made available to support self-build, and the small and medium house builders". In addition to releasing homes to the market more quickly than strategic sites, having a good variety of providers could also have potential to help being forward a range of types and tenures of housing. As a result, positive effects are anticipated.
- 9.29 Strategic Policy 12 (Social and Community Infrastructure) has the potential for direct effects in relation to community infrastructure. The policy intent is to "maintain and improve" the quality of life of residents through ensuring the provision of land for new schools and new health facilities whilst protecting outdoor recreation space and allotments. These community assets are key to ensuring the continued sustainability of settlements, and the provision and protection of such assets is considered likely to have positive effects in relation to communities and population as a result.
- 9.30 Other strategic policies could also have effects in relation to population and communities. Strategic Policy 2 (Sustainable Placemaking and Design) seeks "inclusive design" of places which offers choice and ease of access for all. Strategic Policy 4 (Employment and Skills) looks to ensure that there is "spatial alignment" between housing and employment growth. Strategic Policy 11 (Sustainable Transport and Accessibility) requires new development to be designed and located to enable access to employment, local services and community facilities. Each policy contributes to an overall strategic policy context in which emphasis is placed on sustaining and enhancing the sustainability of both new development in itself and the County's settlements as a whole.
- 9.31 It is important that LDPs plan for the needs of the gypsy and travellers as well as those of the settled community. Strategic Policy 9 (Gypsy and Travellers) seeks to address this through a high-level commitment that "land will be made available to accommodate any future unmet gypsy and traveller accommodation needs" where such need is supported by recent evidence. The supporting text of the policy notes that 5 pitches have been delivered since 2015 in relation to a need of 12 identified in the 2015 Gypsy and Traveller Housing Needs Assessment, leaving a residual need of 7 pitches. However, the Preferred Strategy does not actually allocate a further 7 pitches to meet the residual need, instead advising that an update Gypsy & Traveller Needs Assessment is to be undertaken and "land will be identified" if required. It is considered that uncertain effects must be concluded at this stage as it is not clear that the County has a sufficient supply of suitable sites given that there is uncertainty about the level of need.

#### **Summary Appraisal of the Preferred Strategy**

- 9.32 The Preferred Strategy proposes provision of 2,115 dwellings, of which at least 478 will be affordable. Distribution of this growth will be consistent with the settlement hierarchy, with 45% of growth directed to the Tier 1 settlement of Ebbw Vale, 50% directed to the three Tier 2 settlements of Tredegar, Brynmawr/Nantyglo/Blaina and Abertillery (including Cwmtillery and Six Bells) and the remaining 5% dispersed between the constrained Tier 3, 4 and 5 settlements. This approach focuses the delivery of new homes at the County's most sustainable settlements, with growth principally concentrated at three strategic mixed use sites at the north of the plan area at Ebbw Vale and Nantyglo/ Brynmawr. Residual need after completions and commitments since the plan base date is 833 homes over the plan period.
- 9.33 The broad distribution of growth is supported by a number of policies which are likely to contribute to positive effects in relation to providing a range of homes in sustainable locations and enhancing design quality. Key messages from the relevant strategic policies include: establishing a preference for developing brownfield sites before greenfield; making land available for small and medium housebuilders to ensure supply is not simply coming from major

- developers on strategic sites; embedding opportunities to sustainably access local services and facilities into new development, and; aligning the development of new homes with the development of new employment land.
- 9.34 It is considered that the Preferred Strategy performs positively in relation to the population and community ISA theme and is predicted to have a significant long term positive effect.

- 9.35 Development proposed within the Preferred Strategy has the potential to interact and have cumulative effects with development proposed by other authorities within and beyond the Cardiff Capital Region, particularly in relation to the supply of a sufficient quantity of the new homes in sustainable locations.
- 9.36 The adopted development plans of all surrounding authorities propose meeting or exceeding their housing need. This means that the Preferred Strategy's proposed housing delivery is contributing to a regional position of housing need being met where it arises, which is a significant positive effect in relation to the population and communities ISA theme.
- 9.37 However, in the case of a number of the Cardiff City Region authorities, the level of housing need is very low. For example, the adopted LDP for Torfaen (2013) sets a residual need of 3,897 over the remainder of the plan period, noting that the market may actually struggle to deliver even this relatively modest quantum of growth. Whilst it is positive in principle that such needs are met in full, low housing delivery in absolute terms can result in limited opportunities for delivery of important community infrastructure, such as new or enhanced schools, libraries and community centres as well as affordable housing.
- 9.38 In this context there are likely to be some degree of positive effects in relation to accessibility to services and facilities from the cumulative effects of proposed enhancements to cross-boundary public transport through the Cardiff City Deal. This could help make it easier to access existing services and facilities available at higher tier settlements, including those further afield at Newport and Cardiff, even in locations where the level of growth proposed may not support widespread provision of new local facilities. In the context of Blaenau Gwent this may be of particular benefit to settlements at the south of the plan area, such as Llanhilleth and Swffryd..
- 9.39 Consideration must also be given to the recent publication of a consultation draft NDF which indicates a desire to designate a Green Belt "around Newport and eastern parts of the region". This could affect the distribution of housing to meet identified needs in the region; however, at this stage the proposed Green Belt is uncertain.

## Health and wellbeing

- 9.40 A key aspect of achieving positive health and wellbeing outcomes through new development is the extent to which residents are able to make healthy travel choices for accessing key services, facilities and employment. In practice this means locating development within reasonable walking or cycling distance of such facilities and linking it with suitable walking and cycling infrastructure to connect new development with existing services.
- 9.41 The Plan makes provision for 2,115 homes to deliver a housing requirement of 1,755 homes of which at least 478 will be affordable. In order to meet this an allowance for completions to date, existing commitments, windfall contributions from small and large sites totalling 1,282 homes is made leaving 833 homes to be allocated in the Plan. The new homes will be distributed across the borough in line with the settlement hierarchy with 45% all of the homes being directed to the Primary Settlement, 50% to Main Settlements and 5% to Secondary Settlements, Villages and Hamlets. By directing the overwhelming majority of growth to the Primary and Main settlements the preferred strategy is likely to focus growth at locations which offer the potential for sustainable access to local services and facilities. Correspondingly, by directing a proportionately small amount of growth to the lower tier settlements the Preferred Strategy avoids significant growth at smaller settlements which are likely to have a higher rate of car dependency. This is consistent with the RLDP objective of enabling healthier lifestyles.
- 9.42 Strategic Policy 2 (Sustainable Placemaking and Design) looks to ensure that new development delivers inclusive design that offers choice and access for all and is integrated with wider public transport routes and active travel routes. This is likely to have an indirect minor long term positive effect on health and wellbeing by avoiding the development of new services and facilities which are car dependant or located in peripheral or inaccessible places where possible. In practice this is likely to mean seeking to either integrate new development into the existing Active Travel Network so that they can be accessed by users via walking and cycling or to extend the Active Travel Network so that it links with newly provided services.
- 9.43 Strategic Policy 11 (Sustainable Transport and Accessibility) states that developments should be located and designed to "minimise travel, reduce dependency on the private car and enable sustainable access [to services]". This should be achieved through accordance with the PPW's Sustainable Transport Hierarchy (see Figure 9.1 below), which expects that new development is designed and located so that walking and cycling options are embedded into the built environment. Theoretically this could have potential for long term positive effects in relation to health and wellbeing as it could help unlock a meaningful modal shift away from private vehicle and towards walking and cycling, particularly if commercial and retail development is also integrated into the Active Travel Network. The policy supports a shift towards walking and cycling in its own right and also augments and underpins support for modal shift provided through Strategic Policy 2 and Strategic Policy 3.

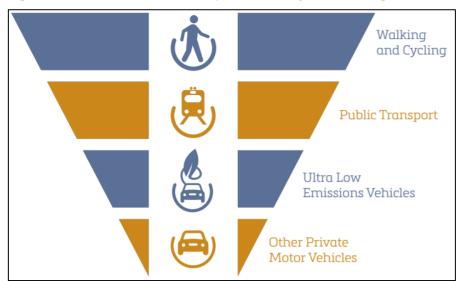


Figure 9.1 The Sustainable Transport Hierarchy for Planning<sup>12</sup>

- 9.44 Strategic Policy 3 (Climate Change) could have an indirect minor positive effect on health and wellbeing by virtue of seeking development at higher densities on sites closest to transport corridors and hubs. Although the principle aim of this is to reduce car dependence through increasing access to public transport, it is likely that by locating a greater proportion of development near transport hubs it will also be located close to other services and facilities. This could have the effect of incentivising walking and cycling as a means of accessing local facilities from higher density developments.
- 9.45 Strategic Policy 4 (Employment and Skills) recognises the importance of locating new employment development in accessible locations where possible, stating that such development should be directed to "the most appropriate and sustainable locations ... ensuring spatial alignment between housing and employment growth". Whilst it is acknowledged that the location of employment development will be significantly influenced by the availability of suitable sites, the policy intent is considered positive in principle as it recognises the need to deliver employment at locations easily accessible by workers, including through healthy means.
- 9.46 Strategic Policy 10 (Retail Centres and Development) could support a long term minor positive effect as it underscores the Preferred Strategy's commitment to support the County's town centres as the principle locations for service provision. This is well aligned with Strategic Policy SP1's distribution of growth to settlements in the top two tiers of the settlement hierarchy as it will help ensure that the growth being distributed to the main settlements continues to be serviced by a wide range of facilities, maximising the opportunities to reach local services by walking and cycling.

#### **Summary Appraisal of the Preferred Strategy**

- 9.47 The Preferred Strategy proposes distributing growth according to the settlement hierarchy with the majority of development directed towards the highest tier settlements where there is greater need and better access to sustainable transport modes and wider infrastructure. This will likely present opportunities to link new development with the existing walking, cycling and Green Infrastructure networks at each of the settlements, whilst also offering potential to secure enhancements to these networks through the development process. It is recognised that proposed growth in Blaenau Gwent is weighted towards the north of the County, this may make it harder to fully integrate the southern settlements into a network of healthy travel options, though the principle of focussing growth at the largest settlements with the most extensive existing active travel network is considered pragmatic and positive.
- 9.48 Overall, the Preferred Strategy is predicted to have a long term positive effect on the health and wellbeing theme; however, this is not anticipated to be significant given the scale of growth.

<sup>&</sup>lt;sup>12</sup> Welsh Government (2018), 'Planning Policy Wales: Edition 10' [online], available at: <a href="https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf">https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf</a>

Where possible it supports growth at locations from which goods, services and local employment could potentially be reached via healthy travel options, subject to detailed matters of site design and layout. It also directs the majority of housing growth to settlements with the widest range of healthcare facilities and requires that such facilities are enhanced as necessary through the development process to continue to provide a high quality service.

- 9.49 The geography and topography of the plan area limits strategic opportunities to seek cross boundary Active Travel infrastructure or to leverage the networks of other regional authorities to build a coherent consolidated network. However, in the context of the Welsh Government's support for active travel and modal shift it is evident that individual authorities are increasingly seeking to incentivise walking and cycling. These efforts at the scale of individual authorities will likely contribute to a positive cumulative effect on the overall health outcomes of residents in the Cardiff City Region.
- 9.50 Although the Ysbyty Anerurin Bevan Hospital in central Ebbw Vale is relatively new and offers excellent facilities, it does not have accident and emergency facilities and there are no A&E facilities within Blaenau Gwent itself. The nearest A&E facilities are currently at Nevil Hall Hospital in Abergavenny and Prince Charles Hospital in Merthyr, though both of these departments are scheduled to close when the forthcoming Grange University Hospital at Cwmbran opens. Growth in Merthyr, Caerphilly, Blaenau Gwent, Torfaen and Monmouthshire could have potential for in combination effects in relation to A&E demand, though the provision of the new hospital is understood to include increased capacity. However, it is understood that the hospital is not particularly accessible by public transport for Blaenau Gwent residents. The emerging revised LDPs for Blaenau Gwent and Monmouthshire should seek to improve public transport accessibility to and from the Grange University Hospital where possible. No significant cumulative effects are anticipated in relation to health and wellbeing.

## Equalities, diversity and social inclusion

- 9.51 Blaenau Gwent has the highest percentage of Lower Super Output Areas (LSOAs) in the 10% most deprived in Wales. This includes 19% of the most deprived LSOAs for income, 28% of the most deprived for education and 23% of the most deprived for community safety.<sup>13</sup> In light of this there are opportunities for the Preferred Strategy to seek plan-led solutions to some aspects of entrenched deprivation in the County.
- 9.52 In this context the focus of the equalities, diversity and social inclusion ISA theme is reducing poverty and inequality, tackling social exclusion and promoting community cohesion. However, some aspects of equalities, diversity and social inclusion do not have a spatial dimension and are unlikely to be directly affected by the spatial distribution of growth through the preferred strategy. For example, promoting community cohesion is likely to be most directly influenced through detailed policies which have the granularity to deliver focused responses at specific locations. Despite this, it is considered that the Preferred Strategy's distribution of growth to the County's main settlements of Ebbw Vale, Tredegar, Brynmawr and Abertillery will have potential for positive effects in relation to some aspects of equalities, diversity and social inclusion. There could be long term positive effects in terms of providing an increase in the quantity and variety of employment, training and housing opportunities in Blaenau Gwent, all of which are important factors in addressing entrenched deprivation.
- 9.53 Inequalities between rural and urban communities can potentially be addressed to an extent through the distribution of new growth. However, the geography of the plan area, with steep-sided valleys separated by elevated ridges, strongly informs the pattern of development in Blaenau Gwent. In this context there is little existing rural development per se and correspondingly little potential for reducing inequalities between rural and urban areas. However, the topographical severance between the valleys could give rise to inequalities and isolation within the plan area, as lateral east-west travel is highly constrained by landform. This could lead to inequalities between communities in each of the plan area's three distinct valleys in terms of access to services, facilities and employment.
- 9.54 The larger settlements are located towards the north of the plan area with Ebbw Vale, Tredegar and Brynmawr all located towards the Heads of the Valleys corridor (though Brynmawr extends in a southerly direction where it connects with Nantyglo and Blaina). This means that the south of the plan area is likely to receive relatively low growth, with even the Tier 2 settlement of Abertillery only receiving 10% growth overall. The Tier 3 settlements of Cwm, Brynithel and Llanhilleth and Tier 4 settlement of Swfrydd at the south of the plan area receive a share of just 5% of overall growth. This reinforces a notional north-south divide within the County, with the north of the plan area receiving over 85% of growth and the south of the plan area receiving less than 15%. This could potentially lead to negative effects in relation to reducing inequalities between the more densely urbanised north and the more sparsely built up south. Correspondingly, it will be of vital importance that transport links between communities in the south where much less growth is being directed and the higher tier service centres are sustained and enhanced to ensure that inequalities in service provision do not become embedded.
- 9.55 Strategic policies likely to have an effect in relation to the equalities, diversity and social inclusion ISA theme are Strategic Policy 2 (Sustainable Placemaking and Design), Strategic Policy 4 (Employment and Skills), Strategic Policy 10 (Retail Centres and Development), Strategic Policy 11 (Sustainable Transport and Accessibility), and Strategic Policy 12 (Social and Community Infrastructure).
- 9.56 There is a critical economic and educational dimension to tackling poverty and exclusion as it is vital that people are given the opportunity to acquire skills and education which empowers them to enter the workplace and find stable, high quality employment. In this sense Strategic Policy 4 could potentially play a significant role as it appears to set out a synergistic approach to the delivery of homes, jobs and training, seeking "spatial alignment" of housing and employment

<sup>&</sup>lt;sup>13</sup> As per the Blaenau Gwent draft Sustainability Appraisal Scoping Report

- growth and the delivery of "a first class learning infrastructure.... to ensure that residents gain the skills they require to match the economic growth sectors". Positive effects are anticipated in this regard, particularly as the Preferred Strategy sets out an ambition to revitalise the local economic profile of the plan area by targeting the "diversification of employment" and "growth in good growth sectors such as new technologies and advanced manufacturing". The policy also aims to lower the unemployment rate, increase the economic activity rate and decrease outcommuting which will have a positive effect in terms of this ISA theme.
- 9.57 Similarly, Strategic Policy 12 (Social and Community Infrastructure) could help boost education and training provision as it states that the RLDP will allocate land for new schools where required. The supporting text of the policy indicates that the main policy intent is to ensure that additional school capacity is provided to serve development proposed through the RLDP, though enhanced or additional school capacity is likely to have a positive trickle-down effect for existing learners, through reducing class sizes, boosting County-wide investment and so on.
- 9.58 High quality placemaking can play a role in tackling social exclusion through well designed, barrier-free environments which can be entered and used safely and with dignity by all members of the community. Strategic Policy 2 identifies the role of design and placemaking in the creation of "vibrant valley communities" which support community wellbeing, including through the implementation of "inclusive design that offers choice and ease of access for all". This could have potential for minor positive effects in relation to equalities and deprivation.
- 9.59 Strategic Policy 11 (Sustainable Transport and Accessibility) sets out the ambition to "enable sustainable access to employment, local services and community facilities" though the delivery of the SE Wales Metro, including connecting Abertillery to the rail network and increasing frequency of services across the County. Deprivation and social exclusion can be entrenched when access to the services and support which can help address them, including healthcare, employment and education, is limited. Strategic Policy 11 will contribute to ensuring continual improvement to access to key services and could have a long term positive effect in relation to equalities, deprivation and social inclusion.

#### **Summary Appraisal of the Preferred Strategy**

- 9.60 The Preferred Strategy focuses growth at the Tier 1 and Tier 2 settlements, though this is not distributed evenly between them. Consequently, Ebbw Vale, as the County's Tier 1 settlement, together with the northern Tier 2 settlements of Tredegar and Brynmawr are distributed over 85% of growth through the Preferred Strategy. The southern Tier 2 settlement of Abertillery, along with smaller Tier 3 and 4 settlements in the south receive less than 15% of growth. Although this distribution is strongly informed by the settlement hierarchy, there could be a risk that the benefits of growth, including provision of new employment and educational capacity, flow largely to the north. Without mitigation this could have potential to embed inequalities in terms of access to services and facilities and it will be important that as growth is delivered in the north access to higher tier service centres from the southern settlements is sustained and enhanced, particularly given the extension of the Ebbw Vale railway line to Abertillery.
- 9.61 Collectively, the Strategic Policies of the Preferred Strategy establish that enhancing access to key services of significance to tackling inequalities and deprivation, such as employment, training and healthcare, will be a priority for the RLDP. This includes a focus on improving access to service centres by sustainable modes of transport, and on designing new development so that multiple uses can be safely and conveniently accessed by all members of the community. Whilst efforts to reduce poverty and inequality, tackle social exclusion and promote community cohesion will clearly require a nuanced approach coordinated between a range of service providers, it is considered that the Preferred Strategy is likely to make a long term positive contribution to addressing the objectives of the equalities, diversity and social exclusion ISA theme; however, this is not anticipated to be significant given the scale of growth.

- 9.62 Regionally important to address inequalities between rural and urban areas though Blaenau Gwent in itself does not have notable capacity for rural development and has few rural settlements.
- 9.63 Addressing the equalities, diversity and social inclusion objectives is not considered to be a primarily spatial matter. In this sense there are unlikely to be significant cumulative effects from development proposed in the Preferred Strategy and development in surrounding authorities.
- 9.64 However, there is a degree of cross-cutting between the equalities theme and other ISA themes, particularly in relation to the role of affordable housing and educational opportunities in tackling entrenched poverty and deprivation. In this sense the fact that Blaenau Gwent and its regional partners are all proposing meeting or exceeding their housing need could be perceived as a positive, as it could offer opportunities to meet complex housing needs within particularly deprived communities, particularly in post-industrial settlements which have struggled over time to develop their economic vitality.
- 9.65 Additionally, it is recognised that the proposed enhancements to regional public transport through the Cardiff City Deal and SE Wales Metro rollout will have potential to ease access to employment and training opportunities as well as services more broadly. Increased accessibility could have potential to reduce social exclusion and reduce some dimensions of deprivation.
- 9.66 On balance, however, it is considered that cumulative effects in relation to equalities, diversity and social exclusion are likely to be neutral as tackling entrenched deprivation and inequality is also likely to be influenced by targeted action addressing specific needs at a local level.

## **Transport and movement**

- 9.67 The transport and movement ISA objectives include improving access to jobs and services, reducing private vehicle use through promoting active travel and encouraging modal shift, and improving access to high speed digital infrastructure to enable working from home. In this context the distribution and amount of growth proposed through the Preferred Strategy performs largely positively as there is a clear focus on directing the majority of growth to the largest settlements at which there are the greatest opportunities to minimise the need to travel and to access sustainable transport options.
- 9.68 The Preferred Strategy proposes delivering the majority of growth at the three strategic mixed use sites of The Works site in central Ebbw Vale, the Ebbw Vale Northern Corridor and the site of the former Nantyglo Comprehensive School. The two Ebbw Vale strategic sites are likely to benefit from good access to Ebbw Vale Town railway station and (though they are more distant from Ebbw Vale Parkway station). The Works site is immediately adjacent to services at the town centre, whilst the Northern Corridor is of a scale that new local services could likely be delivered within the development itself. The remaining strategic site is at Nantyglo is 2.7 miles from Ebbw Vale Town station and therefore beyond reasonable walking distance, though well within walking distance of local services and facilities at Brynmawr. Given the low number of stations in the County it is possible to make an argument that the value of each one is high in terms of the potential for positive effects in relation to transport and movement. In this context it could be appropriate to question whether Abertillery should in fact deliver more growth than the 10% it is proposed on the basis of its position at Tier 2 of the settlement hierarchy and in light of its forthcoming rail connection. In this sense the distribution of growth performs well, though could potentially perform even more strongly by leveraging Abertillery's potential later in the plan period. However, it is recognised that there are topographical constraints associated with growth at this settlement and at this stage a limited number of sites have come forward through the Call for Sites.
- 9.69 The Active Travel (Wales) Act (2013) requires all local authorities in Wales to deliver improvements to their network of active travel routes and facilities. Blaenau Gwent's Active Travel Network includes walking and cycling paths within each of the principle and main settlements though connectivity between the three valleys is limited outside of the Heads of the Valleys built area by virtue of local topography. In this context new development through the Preferred Strategy performs well at a localised scale, offering good potential for new development to link with and enhance the existing network within valley settlements, though the potential for active travel between valleys is limited by topographical constraints.
- 9.70 A suite of other strategic policies provide support for modal shift away from travel by private vehicle and towards sustainable modes, including active transport. This is a reflection of the cross cutting nature of sustainable transport and the fact that promoting and facilitating walking, cycling and public transport use has potential for positive effects in relation to a range of themes.
- 9.71 Strategic Policy 2 (Sustainable Placemaking and Design) seeks the co-location of uses at sites which are easily accessible by sustainable transport and reinforces the importance of minimising the need for unnecessary travel to and between services where there is potential for multiple services to be delivered at a single hub. This is reflected by criterion 3c of Strategic Policy 10 (Retail Centres and Development) which states that through the development process opportunities will sought to "improve access to, and within, retail and commercial centres ... prioritising walking, cycling and public transport".
- 9.72 Strategic Policy 4 (Employment and Skills) recognises the importance of locating new employment development in accessible locations where possible, stating that such development should be directed to "the most appropriate and sustainable locations ... ensuring spatial alignment between housing and employment growth". It is acknowledged that the location of employment development will be significantly influenced by the availability of suitable sites, though the policy intent is considered positive in principle as it recognises the

- need to deliver employment at locations easily accessible by workers, including through sustainable means.
- 9.73 Strategic Policy 8 (Delivery of Homes) prioritises housing delivery at previously developed sites within existing settlements. This could have positive effects in relation to minimising the need to travel as sites which are already within the built area are likely to be closer to existing services and facilities, including transport and employment opportunities. This could lead to housing growth at locations which support meeting many needs via short local journeys which could be undertaken by walking or cycling. This echoes a key message of Strategic Policy 3 (Climate Change) which promotes development on brownfield land and densification on "sites located close to transport corridors or town centres, thereby reducing the overall need to travel".
- 9.74 Strategic Policy 11 (Sustainable Transport and Accessibility) is anticipated to help reduce dependence on transport modes which generate emissions through supporting the creation of a "network of well connected communities", including emphasis on provision of a network of active travel routes. The 2017 Active Travel Consultation identified nine potential walking and cycling routes within and between key settlements in the plan area to provide attractive, viable alternatives to travel by private vehicle.

#### **Summary Appraisal of the Preferred Strategy**

- 9.75 The Preferred Strategy directs the majority of growth to the Tier 1 and Tier 2 settlements which benefit from good access to public transport and active travel networks. The plan area only has three existing railway stations, two of which are at Ebbw Vale, though an additional station is due to be delivered in Abertillery by 2023, which will be served by a spur from the existing Ebbw Vale line. The Preferred Strategy only distributes 10% of growth to Abertillery which in the context of its status as a Tier 2 settlement and its forthcoming rail connection could be below its full development potential. The third existing station is at Llanhileth though its location in the steep-sided Lower Ebbw Fach valley means proposed low growth at the settlement is simply a reflection of its topographical constraints. By focussing growth at the Tier 1 and 2 settlements the Preferred Strategy directs the majority of new development to locations which are closest to local services, facilities and employment. This could help reduce the need to travel by car to meet some needs and could help facilitate walking and cycling.
- 9.76 The strategic policies of the Preferred Strategy establish clear support for embedding walking and cycling connectivity into new development to link new homes and employment sites with services and facilities through active travel. This emerges through several policy strands, including in relation to retail, employment, education and transport hubs. The key message from the suite of strategic policies in relation to active travel is that new development will be expected to contribute to a wider picture of connected places within Blaenau Gwent and that opportunities to deliver sustainable connectivity should be maximised to embed widespread modal shift.
- 9.77 Overall, long term positive effects are anticipated in relation to transport and movement, with the caveat that there could be potential for a greater magnitude of effect if the potential from Abertillery's forthcoming rail connection were leveraged to unlock a higher growth.

- 9.78 There is potential for both negative and positive cumulative effects in relation to transport and movement, particularly in relation to cross boundary roads and railways which stand to be impacted by development both within Blaenau Gwent and regionally.
- 9.79 Growth along the Heads of the Valleys corridor could lead to increased pressure on the road network, particularly the A465. Monmouthshire's emerging replacement LDP proposes delivering over 1,300 new dwellings at Abergavenny as well as new employment land. The replacement Merthyr LDP proposes significant new employment allocations just south of the A465. When considered in combination alongside the new housing and employment proposed in the Ebbw Vale Northern Corridor there is clear potential for additional traffic pressure along

- the A465. However, it is noted that the A465 has recently undergone significant enhancement, including dualling of the carriageway in places, and capacity has therefore been boosted.
- 9.80 Cumulative effects in relation to public transport are projected to be largely positive. The South East Wales Valleys Local Transport Plan (LTP) applies to the Counties of Blaenau Gwent, Caerphilly, Merthyr, Rhondda Cynon Taf and Torfaen. Key goals are the reduction of economic inactivity by improving access and to maximise the contribution of affordable transport to tackling poverty and disadvantage, which synergises well with the Preferred Strategy's distribution of housing and employment growth to the main settlements.
- 9.81 The Cardiff City Region South East Wales Metro expansion will deliver a rail spur to Abertillery by 2023 providing direct rail connectivity via the Metro network to key regional hubs, particularly Cardiff. This enhanced connectivity is consistent with, and contributes towards, regional efforts to encourage a modal shift and to enhance the accessibility of key regional centres by public transport.

#### Natural resources (air, land, minerals and water)

- 9.83 A key consideration under the natural resources ISA theme is the extent to which the Preferred Strategy avoids negative effects in relation to air quality, agricultural land, mineral deposits and water resources where possible. The distribution of growth in line with the settlement hierarchy will ensure that the vast majority (95%) of growth is directed towards existing urban areas, either at Ebbw Vale as the primary settlement or Tedegar, Brynmawr and Abertillery as the main settlements. This gives rise to the potential for positive effects in principle as the existing urban areas are likely to be less sensitive than undeveloped areas. However, the reality is that the proposed development cannot all be delivered on brownfield sites and there will be some loss of greenfield land, which has the potential for a negative effect but this is unlikely to be of significance given the lack of Best and Most Versatile present in the County. As a result, there is an element of uncertainty until the precise location of development is known.
- 9.84 Air quality across Blaenau Gwent is broadly good with no Air Quality Management Areas (AQMAs) declared anywhere in the County and it is considered that the relatively low growth proposed through the Preferred Strategy is unlikely to significantly impact on this. Although it is recognised that growth could have potential to introduce higher levels of traffic it also provides an opportunity to deliver new infrastructure and encourage a modal shift (as discussed under 'Transport'). The quantum and distribution of growth are therefore considered likely to have a neutral effect in relation to air quality.
- 9.85 The County lies on the north eastern edge of the South Wales coalfield which has a legacy of both deep and open cast coal mining. The coal bearing rocks are overlain in the south of the County by Pennant sandstone, the properties of which make it suitable for use as High Specification Aggregate (HSA) as well as general aggregate and building stone. The availability of such materials is limited to relatively few locations in England and Wales and is therefore a nationally important resource. In this context it will be important that new development avoids obstructing or sterilising workable deposits of coal or Pennant sandstone. Safeguarding areas are currently established in relation to both coal and aggregates to help achieve this. The safeguarded areas for primary coal resources are present in close proximity to Ebbw Vale, Tredegar and Brynmawr, whilst the built area of Abertillery is encircled by Pennant Sandstone safeguarding areas. In this context it must be concluded that by focussing growth at these settlements there is potential for negative effects in relation to the natural resources ISA objective for minerals.
- 9.86 Of thirteen waterbodies in the County Borough there are nine classed as having 'moderate' status, two 'poor' status and two 'good' status under the Water Framework Directive. These classifications encompass a number of factors, some of which are likely to be entirely outside the influence of new development through the Preferred Strategy. For example, it is unlikely that physical modifications, such as weirs, will be introduced or removed through the development process. An existing issue related to phosphorous discharge from the Brynmawr Wastewater Treatment Works (WwTW) could potentially be exacerbated should new development create additional wastewater flows to the WwTW. However, in practice, the level of growth at Brynmawr is low and amounts to 423 dwellings over the plan period. It is considered that this is unlikely to have significant effects, as a result neutral effects are anticipated in relation to water quality.
- 9.87 Other strategic policies with potential to have a direct effect in relation to the natural resources ISA theme are Strategic Policies 3 (Climate Change), 6 (Sustainable Minerals Management), 7 (Sustainable Waste Management), 11 (Sustainable Transport and Accessibility), 13 (Protection and Enhancement of the Natural Environment) and 15 (Environmental Protection).
- 9.88 Strategic Policy 6 (Sustainable Minerals Management) sets out the Council's approach to managing its minerals resources, recognising that the intrinsic qualities of minerals deposits are that they are finite and can only be worked where they occur. Key messages from the policy are the need to maintain a 10-year land bank of aggregate reserves, support for the use of secondary and recycled aggregates, safeguarding non-energy deposits (i.e. non-coal deposits)

where they could be worked in the future and ensuring the use of buffer zones between minerals development and sensitive non-minerals development. The support for non-energy deposits signals a move away from coal safeguarding, and this is a notable departure from the policy position of the adopted LDP. Strategic Policy 7 (Sustainable Waste Management) could also have potential for positive effect in relation to the same objective via the commitment to encourage "the use of reused and recycled waste materials in the design, construction and demolition stages of development." This is on the basis that seeking opportunities to recycle aggregates where possible reduces pressure to win new aggregates from extraction sites. Long term positive effects are anticipated in relation to the ISA objective to ensure the provision of an adequate supply of minerals overall.

- 9.89 Strategic Policy 11 (Sustainable Transport and Accessibility) is notable in relation to the natural resources theme as it requires new development to be located and designed in such a way as to "minimise travel, reduce dependency on the private car and enable sustainable access to [services]". Additionally, the policy states that development should "provide vehicle charging infrastructure", which is interpreted as specifically referring to electric vehicles. These measures are considered likely to have a long term positive impact on the natural resources ISA objective to reduce exposure to air pollution.
- 9.90 Strategic Policy 13 (Protection and Enhancement of the Natural Environment) could have potential for positive effects in relation to the ISA objective to minimise pressure for greenfield development and protect higher grade agricultural land. Key messages from the policy in relation to land use include seeking to protect the countryside from inappropriate development. This could help support the protection of higher quality farmland in principle, though in practice it is recognised that there is no 'best and most versatile' agricultural land within the plan area.
- 9.91 Strategic Policy 15 (Environmental Protection) sets a high level requirement for new development to protect and improve "the water environment and water resources" including protecting and improving water quality, to reduce exposure to air and noise pollution and to "take a precautionary approach" to the location of potentially polluting development. The policy intent has potential for positive effects in relation to natural resources but the policy and its supporting text are silent on some key details. For example, the concept of "potentially polluting development" is not defined either in terms of the kinds of development types affected or what is meant by the term pollution. This leaves the policy very broad and consequently, potential effects are uncertain; however, it is recognised that this can be addressed at the Deposit Plan stage through development management policies.

#### **Summary appraisal of the Preferred Strategy**

- 9.92 The Preferred Strategy focuses the majority of growth to Ebbw Vale and the main settlements, which means that there could be opportunities to seek delivery on brownfield sites in the existing urban areas. This would help to direct development away from agricultural land and is consistent with the natural resources ISA objective to make the best use of previously developed land and to minimise pressure for greenfield development. However, ultimately proposed development will result in the loss of greenfield land and this has the potential for a negative effect. It is unlikely that the residual effect will be significant as there is not a significant area of high quality agricultural land in the County.
- 9.93 The baseline position of the County in relation to air quality and water resources is considered unlikely to be affected by development proposed through the Preferred Strategy. Air quality is good across the County as a whole, whilst water resources are unlikely to be impacted by the scale of development proposed. Additionally, a range of policy levers are proposed which will help minimise harm to natural resources whilst also maximising the efficient use of available land.
- 9.94 All of the settlements proposed to deliver the bulk of growth are located partially within mineral safeguarding areas. Abertillery is encircled by a large Pennant sandstone safeguarding area, whilst Ebbw Vale, Brynmawr and Tredegar are all affected by primary coal safeguarding areas. In this context there could be potential for new development to affect access to or future workings of winnable minerals deposits. However, in a significant departure from the adopted policy position, the Preferred Strategy notes that coal safeguarding areas are to be deleted,

- reflecting changes in the national policy context and potential effects on known coal deposits must be seen in this light.
- 9.95 Taking the above into account, an uncertain effect is predicted at this stage as the nature and significance of effects are dependent on the precise location of growth.

- 9.96 There is the potential for a cumulative loss of greenfield land and BMV agricultural land as a result of the distribution of new housing and employment land to meet the need of the South Wales region. Development proposed through the Preferred Strategy has the potential to interact with development proposed through neighbouring authority plans to result in cumulative loss of greenfield and agricultural land.
- 9.97 The County has regional obligations to be met in terms of minerals planning, forming part of the former Gwent sub-region along with Torfaen, Newport and Monmouthshire. In accordance with the PPW (2018) Blaenau Gwent will work collaboratively with neighbouring authorities to consider options for satisfying regional apportionment. The latest position will be updated in the Deposit Plan.
- 9.98 There is the potential for development proposed through the Preferred Strategy to interact with development proposed in other plans and programmes to have both a negative and positive cumulative effect on the water environment. Water resources and wastewater treatment capacity are generally managed at a catchment level and there is close working between Natural Resources Wales, Dwr Cymru (Welsh Water), and wastewater service providers to monitor the situation and plan ahead for new infrastructure to meet predicted demands. Given the total demand for water in the County is forecast to remain relatively stable until 2040<sup>14</sup>, it is considered that the Preferred Strategy will not have a significant negative cumulative effect on this ISA theme.

<sup>&</sup>lt;sup>14</sup> Dwr Cymru Welsh Water (2014), SEWCUS Annual Average Supply Demand Balance Position 2015-2040.

## **Biodiversity and geodiversity**

- 9.99 Strategic Policy 1 proposes the delivery of 46 ha of new employment land and 2,115 new homes during the plan period. The majority of new homes will be directed to Ebbw Vale the Primary Settlement (45% of new homes) and the Main Settlements (50% of new homes) of Tredegar, Brynmawr/ Nantyglo / Blaina and Abertillery (including Cwmtillery and Six Bells). Only a small proportion of the total growth (5%) will be directed to Secondary Settlements, Villages and Hamlets. Strategic mixed use sites are proposed at The Works in central Ebbw Vale, the Ebbw Vale Northern Corridor and the Former Nantyglo Comprehensive School Site. All of these strategic sites are in the north of the plan area.
- 9.100 The northern area of the County is considered to be more sensitive in biodiversity terms as the majority of designated sites are located here. This includes two European sites and their component Sites of Special Scientific Interest (SSSIs) that fall partially within the north of the County Borough. The Cwm Merddog Woodlands SSSI falls entirely within the plan area and is comprised of two parcels of land that are situated to the north east of the village of Cwm in the centre of the County Borough. Two further SSSIs fall partly within the plan area in the north, Mynydd Llangatwg SSSI and Brynmar Sections SSSI. The management statements for these SSSIs suggest that the management of the land is key to maintaining a favourable condition status, highlighting the importance of managing new development in the vicinity of the sites. Disturbance is identified as an issue for both sites and it is likely that additional growth nearby would increase the risk of disturbance further.
- 9.101 The HRA found that development proposed through the Preferred Strategy is not likely to have significant effects on the majority of European sites. However, due to the combination of missing scientific evidence (i.e. no air quality modelling available) and the level of detail in the current Preferred Strategy (i.e. no site allocations, limited policy wording), a definitive Appropriate Assessment of the following impacts pathways has been deferred to the Deposit Plan HRA:
  - Atmospheric pollution impacts on the Usk Bat Sites SAC and the Cwm Clydach Woodlands SAC;
  - Functionally linked land relating to the Usk Bat Sites SAC; and
  - Water quality in the River Usk SAC.
- 9.102 The HRA could not rule out adverse effects on the site integrity of the Usk Bat Sites SAC and the Cwm Clydach Woodlands SAC as a result of atmospheric pollution, because air quality modelling for sensitive habitat components within these sites is not available. The HRA recommended that the Council model a minimum of one road transect in each of these SACs to inform the Deposit Plan HRA.
- 9.103 Regarding land that is functionally linked to the Usk Bat Sites SAC, the HRA could not conclude that adverse effects could be excluded because the site allocations are not yet available for assessment. A definitive Appropriate Assessment of this impact pathway is therefore deferred to the Deposit Plan HRA. Nonetheless, to help reduce the potential for adverse effects, the HRA recommended that protective policy wording is provided in the Deposit Plan that recognises the 2km Core Sustenance Zone (CSZ) for lesser horseshoe bats (see HRA for detailed wording). Scientific evidence indicates that foraging and/ or commuting habitat within this buffer is essential for the integrity of the bat populations in the SAC.
- 9.104 Finally, regarding water quality, a full Appropriate Assessment will be undertaken for the Deposit Plan, when the spatial distribution of development and its associated Wastewater Treatment Works (WwTWs) infrastructure is available. However, if development in the northeastern section of Blaenau Gwent is coming forward, which is served by WwTWs that discharge into the catchment of the River Usk SAC, the HRA recommended that precautionary wording is incorporated into an appropriate policy of the Deposit Plan to ensure that any new

- development can be accommodated within the permitted headroom of WwTW infrastructure (see HRA for detailed wording).
- 9.105 Of the 12 Local Nature Reserves (LNR) in the Plan area there is a notable concentration in the north along the Heads of the Valleys road area, with the remainder more evenly distributed. As the Preferred Strategy directs substantial growth to the Heads of the Valleys Corridor strategic site this could result in additional recreational pressure on the Beaufort Hills Pond and Woodland LNR and the Parc Nant-y-Waun LNR in particular. A number of Sites of Importance for Nature Conservation (SINCs) surround the urban areas of Blaenau Gwent and several lie within the urban areas, suggesting that growth under the Preferred Strategy will likely have localised effects on SINCs.
- 9.106 Recognising the potential for effects on sensitive designated sites, Strategic Policy 13 (Protection and Enhancement of the Natural Environment) sets out a broad array of policy requirements to mitigate adverse effects from development and amplify potential positive effects. The policy seeks to:
  - protect and enhance the natural environment by ensuring development has no effect on neighbouring SACs;
  - protect SSSIs from adverse effects;
  - protect and enhance SINCs and LNRs through the development process;
  - create habitat networks by linking Local Wildlife Sites through green infrastructure corridors to build resilience into existing ecosystems; and
  - ensure development seeks a biodiversity net gain.
- 9.107 This is supported by Strategic Policy 2 (Sustainable Placemaking and Design) which states that new development should have "consideration of ecosystems services".

#### Summary appraisal of the Preferred Strategy

- 9.108 The proposed distribution of growth through the Preferred Strategy could potentially see new development delivered in relatively close proximity to a variety of designated sites. It is notable that the Preferred Strategy distributes the majority of development to the north of the plan area which contains a number international and nationally designated sites. In this context there is the potential for impacts on biodiversity and these could have negative effects. The Preferred Strategy sets out a range of policy requirements to avoid or mitigate potential adverse effects from development. It also sets out policy requirements for development to deliver a net gain in biodiversity, particularly in terms of the strategic sites.
- 9.109 At this stage the residual effect of the Preferred Strategy is uncertain. The nature and significance of effects are dependent on the precise location of development, which is not known at this stage. It is recognised that the majority of growth to be delivered during the plan period is committed development, including the three strategic mixed use sites, as a result it is unlikely that significant negative effects will arise but this is dependent on the location of the remaining growth to be delivered. The ISA will be informed by the HRA work carried out for the Deposit Plan.

- 9.110 Development proposed through the Preferred Strategy has the potential to interact with growth proposed in other areas outside the County and have cumulative effects. This includes development plans in surrounding authorities, particularly Merthyr, Caerphilly, Torfaen, the Brecon Beacons National Park and Monmouthshire, plus development plans in wider South East Wales and South West England. All of these development plans include policies which seek to protect and enhance biodiversity.
- 9.111 Further HRA work will be carried out to address the likelihood for adverse effects on the integrity of any European designated sites as a result of development proposed through the RLDP acting in-combination with other plans and projects. Furthermore, the candidate site

- assessment process will consider the impacts of development at specific sites on biodiversity and this issue will also be considered further through the ISA process.
- 9.112 It will be important for Local Planning Authorities and stakeholders, such as Natural Resources Wales, to work closely to identify potential cross-boundary issues and seek to protect and enhance ecological corridors that cross authority boundaries where possible. Where possible, any strategic opportunities to deliver biodiversity net gain should be explored.

#### **Historic environment**

- 9.113 Strategic Policy 1 (Sustainable Economic Growth) states that provision will be made for the delivery of 2,115 homes over the plan period. Of this total, at least 478 homes will be affordable, subject to viability. Since the plan base date in 2018 the number of completions, commitments and windfall contributions from small and large sites totals 1,282 homes, leaving 833 homes to be allocated in the Plan. As such, the significance of effects on the historic environment through the delivery of the Preferred Strategy is reduced somewhat; however, still dependent on the precise location and layout of development.
- 9.114 Strategic Policy 1 directs almost half of the growth during the plan period to Ebbw Vale as the main settlement in the County (45%). The Tier 2 settlements of Tredegar and Brynmawr/ Nantyglo/ Blaina will each receive 20% of growth; which amounts to 85% of growth overall between these settlements. There is a range of designated heritage assets located within and around these settlements. Notably, Brynmawr is located at the 'gateway' to the Blaenavon World Heritage Site. Furthermore, 53 listed buildings are distributed relatively evenly between the principal northern settlements, though a cluster of listed buildings is evident at Tredegar, suggesting heightened historic sensitivity. The cluster at Tredegar corresponds with the area around the County's only Registered Historic Park and Garden (RHPG) at Bedwellty Park, which is also a designated Conservation Area. A second Conservation Area at Tredegar, the Southern Town Area, lies immediately north of Bedwellty Park.
- 9.115 There is a particular focus of Scheduled Ancient Monuments in the northern settlements. These features reflect both the industrial history of the area and its ancient Celtic heritage. Features such as the Marine Colliery Pumping Engine in Ebbw Vale and the Incline Haulage Winding Engine near Tredegar contribute to an understanding of the area's industrial heyday, whilst features such as cairns, hut circles and mounds point to a historic identity dating back to a much older era. The Preferred Strategy has the potential to impact upon these designated heritage assets, and the wider historic environment within and surrounding settlements depending on exactly where development is located.
- 9.116 Strategic Policy 8 (Delivery of Homes) reiterates the level of housing growth to be delivered during the plan period as per the Preferred Strategy and further states that when allocating housing sites, "priority will be given to previously developed (brownfield) land within existing settlements, then previously developed land on the edge of existing settlements and then greenfield sites within or on the edge of settlements". This is with the aim of continuing the target for 80% of new development to be on brownfield land; and is reflected through the three strategic mixed-use sites proposed by Strategic Policy 1. However, while these sites will contribute to the delivery of the housing and employment growth, it is recognised that a significant proportion of these sites are already committed development, i.e. have planning permission.
- 9.117 Nonetheless, identifying three strategic mixed-use sites for development offers a level of certainty in terms of where development is taking place. Future development at The Works site in central Ebbw Vale will take advantage of the significant brownfield opportunity the site affords. Previous industrial uses on the site have long been cleared and there is no sensitivity in terms of on-site heritage assets. The RLDP highlights that the site Masterplan is supported by design codes, which has the potential for positive effects on the historic environment through regeneration of the former steelworks site, delivering a vibrant and distinctive business hub that reflects and champions the historic industrial settlement identity. The significance of effects will be dependent on the precise layout and design of development.
- 9.118 The Ebbw Vale Northern Corridor has no notable sensitivity in terms of on-site heritage assets, though its location within the urban area gives rise to potential for development to impact upon the settlement's wider historic character and setting. Residual effects therefore have the potential to be positive or negative; and will be dependent on the precise layout and design of development.

- 9.119 Future development at the Former Nantyglo Comprehensive School site will be supported by a Masterplan and has potential to lead to positive effects on the wider historic environment through well designed, sensitive regeneration which reflects the wider historic settlement identity. The site itself is not sensitive in terms of heritage assets, and its potential to directly affect townscape, setting or views of the wider settlement are limited. The significance of effects will be dependent on the precise layout and design of development.
- 9.120 Although only 5% of development is being directed to the lower Tier (Tiers 3-5) settlements, it is nonetheless recognised that there is the potential for impacts on the historic environment in these areas. Residual effects in this respect are uncertain at this stage as the precise location of growth is not known; however, given the scale of growth this is unlikely to be significant. As most growth is directed to the main settlement areas, effectively integrated new housing and employment development can support cultural vitality, inclusive communities and a thriving Welsh language in the historic towns.
- 9.121 In terms of the future well-being of the Welsh language the Preferred Strategy is not likely to have any direct significant effects. This is dependent on a range of factors beyond the planning system, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The Preferred Strategy will deliver new homes and employment opportunities as well as associated infrastructure improvements. As most growth is directed to the main settlement areas, effectively integrated new housing and employment development can support cultural vitality and inclusive communities. This is likely to have a long term indirect positive effect on the future of the Welsh language; however, this is unlikely to be significant.
- 9.122 A number of other Preferred Strategy policies seek to support and guide development to minimise its impact on the historic environment and maximise opportunities for enhancements. These include Strategic Policy 3 (Climate Change), Strategic Policy 5 (Growing Tourism), Strategic Policy 9 (Gypsy and Travellers), Strategic Policy 10 (Retail Centres and Development), and Strategic Policy 12 (Social and Community Infrastructure).
- 9.123 The Preferred Strategy includes policies that will help to reduce the impact of proposed development on the historic environment. This includes Strategic Policy 2 (Sustainable Placemaking and Design) which requires development to "create sustainable places where people want to live, work and socialise". To achieve this development should deliver, "sustaining or enhancing local character in terms of the layout, form, scale and visual appearance of development".
- 9.124 Strategic Policy 13 (Protection and Enhancement of the Natural Environment) sets out that "Blaenau Gwent's distinctive natural environment and landscape will be protected and where possible enhanced". This includes through "Protecting the countryside from inappropriate development" and "protecting those attributes and features which make a significant contribution to the character, quality and amenity of the landscape."
- 9.125 Strategic Policy 14 (Preservation and enhancement of the built environment) states that "Blaenau Gwent's distinctive built environment will be protected, preserved and where appropriate enhanced". This includes through the "protection and sustainable management of the Blaenavon World Heritage Site setting and buffer zone;" and "Preserving and enhancing the Tredegar Conservations Areas".

## **Summary appraisal of the Preferred Strategy**

- 9.126 As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the historic environment theme/ ISA objectives. While three mixed-use strategic sites have been identified, it is recognised that these are regeneration sites, with no inherent built heritage sensitivity. Furthermore, the majority of the sites already have planning permission and are therefore not likely to significantly influence the ISA findings.
- 9.127 There are a number of designated heritage assets within and surrounding the main settlements where the majority of growth is being directed. As a result, there is the potential for impacts on these sensitive receptors, including their setting. The historic environment, including

- designated heritage assets, will need to be taken into account through the Council's candidate site appraisal process and inform the allocation of sites in the Deposit Plan.
- 9.128 The Preferred Strategy includes policies that seek to protect and where possible enhance the landscape and historic environment. Taking the above into account, an uncertain effect is identified at this stage as the nature and significance of effects are dependent on the precise location and scale of growth at individual sites.

- 9.129 Development proposed through the Preferred Strategy has the potential to interact with development proposed through other plans to have a cumulative effect on the historic environment. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the historic town centres; notably surrounding Tier 1 and 2 settlements along the Heads of the Valleys. Consideration is also given to potential cumulative impact on the Blaenavon World Heritage Site (WHS); given part of the buffer zone is located within Blaenau Gwent.<sup>15</sup>
- 9.130 None of the WHS falls within the Blaenau Gwent County Borough Council administrative area; however, the south-western boundary of the WHS runs parallel with the Blaenau Gwent County Borough's. Therefore, as a near neighbour, Blaenau Gwent has a close interest in the management of the World Heritage Site. Growth proposed through the Preferred Strategy alongside growth proposed through the emerging spatial strategies for the Torfaen and Monmouthshire Local Development Plan has the potential to cumulatively affect the sensitive historic site and its setting. It is recognised however, that all of the Local Development Plans will include policies which seek to protect and enhance the historic environment. Notably, the WHS Management Plan seeks to deliver "integration with the wider area beyond the World Heritage Site boundary"; protecting and enhancing the wider setting of the designated area.
- 9.131 It will be important for Local Planning Authorities and stakeholders, such as Cadw, to work closely to identify potential cross-boundary issues and seek to protect and enhance heritage settings that cross authority boundaries where possible. Where presented, any strategic opportunities to deliver heritage-led regeneration, in line with the WHS Management Plan, should be explored.

<sup>&</sup>lt;sup>15</sup> LANDMAP has been completed for Torfaen County Borough Council, Monmouthshire County Council, the Brecon Beacons National Park and Blaenau Gwent County Borough Council. LANDMAP therefore covers the whole of the World Heritage Site and the geographical area that may be considered as a buffer zone <a href="http://www.ccw.gov.uk/landscape--wildlife/protecting-ourlandscape/landmap.aspx">http://www.ccw.gov.uk/landscape--wildlife/protecting-ourlandscape/landmap.aspx</a>

## Landscape

- 9.132 Blaenau Gwent has a rich and diverse landscape bordering the Brecon Beacons National Park, and the Blaenavon Industrial Landscape World Heritage Site (WHS). The most important and best surviving historic landscapes have been identified on the non-statutory Register of Landscapes of Outstanding and of Special Interest in Wales. This register has been compiled by Cadw, Natural Resources Wales and the International Council on Monuments and Sites (ICOMOS UK) and includes 'Blaenavon' and 'Clydach Gorge', which partially fall within the Blaenau Gwent planning administrative area, along the eastern administrative boundary. 'Blaenavon' covers the Blaenavon WHS and surrounding hinterlands, with a very small area falling within the County Borough to the east of Blaina. 'Clydach Gorge' ranges east to west along the A465 Heads of the Valley road, extending to the urban area of Brynmawr at the A465/ A467 roundabout.
- 9.133 There are also eight Special Landscape Areas (SLAs) within Blaenau Gwent that are designated in the currently adopted LDP and cover a total area of approximately 7,614 hectares, accounting for approximately 70% of the total local planning area within the County. As set out in the RLDP, the purpose of the SLA designation was to "identify those landscapes which are of particularly high intrinsic value and which require special protection for their own sake as part of the County's landscape resource." This reflects PPW (2018), which states that "Planning authorities should provide for the conservation and, where appropriate, enhancement of local landscapes [...] including the designation of SLAs."
- 9.134 While protection is provided at the higher level, it is nonetheless considered that development proposed through the Preferred Strategy has the potential to adversely impact upon historic landscapes and character as well as the setting of designated heritage assets. Strategic Policy 1 (Sustainable Economic Growth) states that provision will be made for the delivery of 2,115 homes over the plan period. Of this total, at least 478 homes will be affordable, subject to viability. Since the plan base date in 2018 the number of completions, commitments and windfall contributions from small and large sites totals 1,282 homes, leaving 833 homes to be allocated in the Plan. This leaves a considerably reduced residual requirement to be delivered during the plan period. As such, the significance of effects on the landscape through the delivery of the Preferred Strategy is reduced somewhat but dependent on the precise location of development.
- 9.135 Growth itself is directed to the most sustainable settlements with capacity for development (notably 45% to Tier 1 settlement Ebbw Vale; 50% to Tier 2 settlements Tredegar, Brynmawr/Nantyglo/Blaina and Abertillery (including Cwmtillery and Six Bells); and 5% to the remaining lower Tier settlements).
- 9.136 While the exact location is currently unknown, it is nonetheless considered that focussing development at the higher tier settlements has the potential to impact on designated and non-designated valued landscapes discussed above, in addition to local landscape, townscape character, and setting. However, directing growth to the Head of the Valleys corridor does offer potential for development to sit comfortably within the existing built context without significantly impacting views into the area from the Brecon Beacons and other surrounding areas of high ground/ high landscape value. Limiting growth to the south of Blaenau Gwent is likely to reduce the potential for negative effects in this part of the County Borough. This is given that the south is substantially less developed and more rural in nature when compared with the north, with its dramatic landscape setting considered more sensitive to change. Notably, Abertillery has a distinctive and characterful setting within the valley.
- 9.137 Nonetheless, it is considered that given the topography of the County Borough and valued landscape present, development will ultimately change the landscape setting to some degree, with the potential for both positive and negative effects. Negative effects are ultimately anticipated due to a loss of greenfield land affecting local landscape character, with development also considered likely to affect views from the National Park given the rural nature and topography of the County. Further potential negative effects and potential positive effects

- are dependent upon the delivery of high-quality design and efficient layout and orientation these aspects remain uncertain until site proposals are assessed, and are largely guided by policy which will be set out in the detailed policies in the Deposit Plan.
- 9.138 Strategic Policy 8 (Delivery of Housing) states that when allocating housing sites, priority will be given to previously developed (brownfield) land within existing settlements, then previously developed land on the edge of existing settlements and then greenfield sites within or on the edge of settlements. Growth delivered on brownfield land has potential for positive effects on the landscape/ townscape through the regeneration of previously developed land if sensitively designed. The Preferred Strategy aims to continue the target for 80% of new development on brownfield land; as reflected through the three strategic mixed use sites at The Works, the Northern Corridor and the Nantyglo Comprehensive School site.
- 9.139 Development at The Works will be set in the context of wider redevelopment at this brownfield site. The site has no notable landscape sensitivity, and redevelopment will offer significant opportunities for positive effects on the townscape of central Ebbw Vale. The RLDP highlights that the site Masterplan will deliver a vibrant and distinctive business hub that supports settlement identity, though the significance of effects will be dependent on the precise scale, layout and design of development.
- 9.140 Although there is little inherent landscape or townscape sensitivity at the Ebbw Vale Northern Corridor area, development could reduce the gap between Beaufort and Dukesdown. Development may therefore set precedent for further development to the west, leading to perceptual coalescence between these two settlements. However, it is noted that Bryn-Serth Road forms a physical boundary to development, which may reduce the potential for further growth. In terms of impact on views into and out of the site, it is noted that mature trees/woodland line the site to the north and east, providing a level of screening. While there may be the potential for adverse effects on landscape character and setting, the RLDP states that "future development will capitalise on the opportunities presented by the environmental setting through delivering high quality public realm and green infrastructure." Residual effects therefore have the potential to be positive or negative; and will be dependent on the precise scale, layout and design of development.
- 9.141 Future development at the largely brownfield Nantyglo Comprehensive School site will be supported by a Masterplan with the potential for positive landscape effects through regeneration to deliver a well-designed mixed-use site that supports settlement identity. The site is bound to the east by the A467 and is not considered to be sensitive in landscape terms. While the southern extent of the site is greenfield, the site is surrounded to the south, southeast and southwest by mature trees/ hedgerows which provide a level of screening; reducing the potential for adverse effect on townscape, setting or views. The significance of effects will be dependent on the precise layout and design of development. At all three strategic sites it is recognised that a significant proportion is already committed development.
- 9.142 Strategic Policy 2 (Sustainable Placemaking and Design) supports the delivery of high-quality design standards, requiring that development "create sustainable places where people want to live, work and socialise." In order to achieve this, in line with Policy 2, all development should deliver:
  - "Environmental Sustainability in terms of maximising energy efficiency, making efficient use of resources, preventing the generation of waste and pollution, and consideration of ecosystems services; and
  - Sustain or enhance local character in terms of the layout, form, scale and visual appearance of development."
- 9.143 Strategic Policy 13 (Protection and enhancement of the natural environment) further strengthens the protection afforded to local landscape, stating that "Blaenau Gwent's distinctive natural environment and landscape will be protected and where possible enhanced." In line with Policy 13, protective measures include:
  - "Protecting and enhancing important landscapes such as the nationally designated Brecon Beacons National Park and locally designated Special Landscape Areas;

- Protecting those attributes and features which make a significant contribution to the character, quality and amenity of the landscape; and
- Building resilience into the existing ecosystems through creating a network of green infrastructure and local wildlife sites linked by wildlife corridors and stepping stone."
- 9.144 The importance of protecting and enhancing Green Infrastructure is a key policy theme within PPW, recognising the multi-functional roles it has in delivering the goals and objectives of the Future Generation and Wellbeing Act. PPW 10 defines Green Infrastructure as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places". Delivering a network of Green Infrastructure through the Preferred Strategy (as set out in Strategic Policy 13 above) will enhance the character and identity of Blaenau Gwent's settlements and countryside, encourage sustainable lifestyles and create attractive, safe and accessible places. This is supported through a number of other Preferred Strategy policies including Strategic Policy 3 (Climate Change), Strategic Policy 12 (Social and Community Infrastructure), and Strategic Policy 14 (Preservation and Enhancement of the Historic Environment).
- 9.145 The implementation of the Preferred Strategy policy framework will therefore contribute positively towards meeting the RLDP objective to "protect, enhance and manage the distinctive landscape of Blaenau Gwent to help foster sustainable tourism and community pride." In this context, in accordance with Strategic Policy 5 (Growing Tourism), the Preferred Strategy will support "high quality accommodation, venues, businesses, events, attractions, cultural tourism, rural enterprise, activity tourism and a diverse and attractive food and drink sector" and "the establishment of the Valleys Regional Park". However, this is "providing developments avoid unacceptable, adverse environmental or amenity impacts and are supported by adequate existing or new infrastructure provision."

#### **Summary appraisal of the Preferred Strategy**

- 9.146 The Preferred Strategy proposes the delivery of new employment land and homes to meet identified needs and provide flexibility throughout the plan period. Growth is being distributed according to the settlement hierarchy, with 45% of growth directed towards Ebbw Vale; 20% to Tredegar, and 20% to Brynmawr. Focussing growth to the Heads of the Valleys has the potential to have impacts on important landscapes; Blaenau Gwent has a rich and diverse landscape bordering the Brecon Beacons National Park, and the Blaenavon Industrial Landscape World Heritage Site. Additionally, Special Landscape Areas within Blaenau Gwent cover a total area of approximately 7,614 hectares, accounting for approximately 70% of the total local planning area within Blaenau Gwent area.
- 9.147 Preferred Strategy policies seek to ensure that development retains and enhances landscape features, and the overall landscape character and rural setting, to reduce the extent and significance of the potential effects of the required growth. Notably, brownfield land, followed by edge of settlement greenfield land, is prioritised.
- 9.148 At this stage the residual effect of the Preferred Strategy is uncertain on the landscape. The nature and significance of effects are dependent on the precise location of development, which is not known at this stage. It is recognised that the majority of growth to be delivered during the plan period is committed development, including the three strategic mixed use sites, as a result it is unlikely that significant negative effects will arise but this is dependent on the location of the remaining growth to be delivered.

- 9.149 Development proposed through the Preferred Strategy has the potential to interact with development proposed through other plans to have a cumulative effect on the landscape. Interactions of greatest significance are likely to be those plans, programmes and projects that impact upon the Brecon Beacons National Park and the Blaenavon World Heritage Site, given their importance nationally. The National Park lies adjacent to the border of the County Borough, to the north east, along the Heads of the Valleys. Brynmawr is identified through the RLDP as being located "at the gateway" to the Brecon Beacons National Park and Blaenavon World Heritage Site. Cumulative effects in relation to the World Heritage Site have been discussed above under the 'Historic Environment' ISA theme.
- 9.150 In terms of the National Park, consideration is given to the other Local Authorities which the National Park covers and where development is being proposed:
  - Powys County Council;
  - Carmarthenshire County Council;
  - Monmouthshire County Council;
  - Merthyr Tydfil County Borough Council;
  - Torfaen County Borough Council; and
  - Rhondda Cynon Taff County Borough Council.
- 9.151 When considering cumulative effects of development on the National Park, consideration should be given to the protections provided by the National Park Management Plan (2015). In addition to national policy requirements, the Management Plan sets out under six Themes, policies and priorities for managing change in the National Park. 16 Notably, Theme five (Building and Maintaining Sustainable Communities, Towns and Villages) considers the environmental capacity approach to spatial development demonstrated in the LDP.
- 9.152 Ultimately the nature and significance of effects will be dependent on the precise location as well as design/ layout of development and the implementation of mitigation measures. It will be important for Local Planning Authorities to work closely with each other as well as Natural Resources Wales, to try and plan at a landscape scale, minimise potential impacts as well as identify opportunities to deliver improvements where possible, including the delivery of new valued landscapes.

<sup>&</sup>lt;sup>16</sup> Brecon Beacons National Park (2020) A Management Plan for the Brecon Beacons National Park 2015-2020 <a href="https://www.beacons-npa.gov.uk/wp-content/uploads/BBNP-Management-Plan-PROOF-03-03-16-English.pdf">https://www.beacons-npa.gov.uk/wp-content/uploads/BBNP-Management-Plan-PROOF-03-03-16-English.pdf</a>

## **Climate change**

- 9.153 The Climate Change ISA objectives are to both mitigate and adapt to the effects of climate change through increasing energy efficiency and using low carbon and renewable energy sources where possible. Adapting to the effects of climate change includes the need to adapt to increased flood risk, whilst a key focus of mitigating climate change is the need to reduce CO<sub>2</sub> emissions from the built environment.
- 9.154 The distribution of growth proposed by the Preferred Strategy is likely to perform well in relation to climate change adaptation, particularly in terms of flooding. The plan area is not notably constrained by flood risk overall. Corridors of fluvial flood risk are aligned with the principal watercourses as they flow through each of the three valleys in the plan area (i.e. Ebbw Fach; Sirhowy and Ebbw Fawr), though the extent of these areas is generally limited, partly reflecting the fact that flat, low lying land is restricted to narrow linear strips by the prevailing landform of the area. The Heads of the Valleys built area along the alignment of the A465 is notably unconstrainted by fluvial flood risk. Surface water flood risk is more widespread, particularly within the existing built areas, though the level of surface water risk appears relatively constant throughout the plan area, i.e. there are no clear 'hotspots' where risk is notably higher than elsewhere. In this context the distribution of growth through the Preferred Strategy is likely to perform well as it largely avoids the corridors of fluvial flood risk along the alignment of the main watercourses.
- 9.155 In terms of climate change mitigation, the Preferred Strategy has a mixed performance. In 2017 the proportion of CO₂ emissions in Blaenau Gwent from the built environment, i.e. from both domestic and industrial/ commercial sources, was around 73% which closely echoes the Wales national average of 75%. Transport emissions comprised the remainder. This is likely to reflect that the County is relatively compact and distances between settlements are not significant. The Preferred Strategy proposes concentrating growth at the existing urban areas and it is considered unlikely that this will appreciably impact the proportion of emissions from the built environment. On the understanding that the Preferred Strategy is delivering relatively low growth in absolute terms, it is unlikely that it will facilitate significant opportunities for delivering low carbon energy production, such as combined heat and power (CHP) schemes. It is considered unlikely that the distribution of growth through the Preferred Strategy will appreciably reduce emissions from the built environment.
- 9.156 Other key strategic policies likely to have an effect in relation to climate change adaptation and climate change mitigation are Strategic Policies 3 (Climate Change), 6 (Sustainable Minerals Management), 11 (Sustainable Transport and Accessibility) and 15 (Environmental Protection).
- 9.157 Strategic Policy 3 (Climate Change) provides the Preferred Strategy's key policy platform for addressing both climate change adaptation and climate change mitigation, requiring all development proposals to "make a positive contribution towards addressing the causes of, and adapting to the impacts of climate change". The policy presents several strands by which this will be sought. In terms of climate change adaptation, the policy is clear that new development should avoid or minimise the risk of flooding. This is interpreted as effectively establishing a presumption against residential development in Flood Zone C (i.e. the area of highest flood risk). The policy also identifies Sustainable Urban Drainage Systems and flood resilient design as important features for new development to incorporate to maximise its flood resilience. Whilst the policy does not expand the PPW position in relation to flood risk it serves to reinforce good practice in terms of minimising the risk from flooding through the development process.
- 9.158 Key messages from Strategic Policy 3 in relation to climate change mitigation include a requirement for new development to reduce energy demands, promote energy efficiency, support low carbon energy generation and support development proposals which incorporate district energy network development and the district heating network. In principle this suite of policy requirements is anticipated to lead to positive effects in relation to climate change mitigation as it seeks to embed energy efficiency into new development from the outset, whilst also providing support in principle for innovative new energy generation.

- 9.159 The Blaenau Gwent Energy Prospectus identifies the opportunity for development proposals to incorporate district energy network development and expansion of The Works district heating network. This is likely to have a long term positive effect in relation to climate change mitigation.
- 9.160 Strategic Policy 6 (Sustainable Minerals Management) is potentially significant in relation to climate change mitigation as the policy only provides support for safeguarding "non-energy deposits", indicating that the safeguarding of coal deposits is no longer supported. This is made explicit in Appendix 1 which notes that the adopted LDP policy M1 (Safeguarding of Minerals) must be revised in the RLDP so that "coal safeguarding areas are deleted to reflect national policy". This is considered to be significantly positive in relation to climate change mitigation.
- 9.161 Strategic Policy 13 (Protection and Enhancement of the Natural Environment) could also have indirect implications for climate change mitigation. Although the primary intent of the policy relates to landscape and the natural environment, criterion 9's support for "woodland planting" could have potential for significant positive effects for climate change mitigation, particularly if implemented at scale. Widespread forestation can play a significant role in reducing net greenhouse gas emissions through the absorption of carbon.

#### **Summary appraisal of the Preferred Strategy**

- 9.162 The distribution of growth proposed through the Preferred Strategy performs well overall in relation to climate change adaptation. Corridors of fluvial flood risk which follow the alignment of the main watercourses are narrow and though they flow through many of the settlements the area of risk itself is generally tightly contained. The three proposed strategic sites are all outside areas of Flood Zone B and C, though it is noted that the former Nantyglo Comprehensive School site is adjacent to Flood Zone C. There would likely be potential to incorporate a buffer zone of open space if necessary. Surface water flood risk is more patchy and affects a wider area, though the Preferred Strategy does not distribute growth to settlements at which surface water flood risk is unavoidable. The three strategic sites all contain small localised areas of risk though are predominantly free of risk overall. It is considered that mitigation would be achievable through the design and layout of development. Positive effects are anticipated.
- 9.163 In relation to climate change mitigation the quantum and distribution of growth are considered unlikely to result in significant effects. The overall quantum of growth to be delivered through the plan is low and there is a clear focus on brownfield land or undeveloped land within the urban area in terms of its proposed distribution. Although any scale of growth has the potential to increase emissions from the built environment to some extent, the limited scale of growth and its efficient use of available land (i.e. not expanding the built area overall) means that neutral effects are anticipated.
- 9.164 The key policies of the Preferred Strategy seek to minimise adverse effects in relation to flooding and to emissions, or mitigate these where avoidance is not realistic or practicable. Strategic Policy 3 (Climate Change) is the key policy platform for achieving this, and seeks to embed consideration of the potential effects from new development on climate change into decision making. The policy effectively establishes a presumption against all but exceptional development in Flood Zone C though recognises that SUDS may have a role in mitigating any residual risk in lower risk areas. Requirements to deliver high energy efficiency in all new development and in-principle support for low carbon energy generation are also established. It is also recognised that the draft NDF identifies solar and wind energy priority areas, one of which falls within Blaenau Gwent. Overall, long term positive effects are anticipated in relation to climate change but these are unlikely to be of significance.

- 9.165 In terms of climate change adaptation there does not appear to be notable potential for negative cumulative effects from development in Blaenau Gwent in combination with development in neighbouring plan areas. Although narrow areas of fluvial flood risk are present in the County, in alignment with the main watercourses, there is a presumption in the PPW against development in Flood Zone C2, the highest risk zone. This is augmented by Technical Advice Note 15 (TAN15) which emphases that "plan allocations should not be made" in Flood Zone C2. This will help ensure that development in Blaenau Gwent will be part of a regional and national picture of development which is directed away from areas at high risk. In this sense effects from the Preferred Strategy in combination with surrounding authorities are likely to neutral when taking other policy mitigation into account.
- 9.166 In terms of climate change mitigation there is greater potential for cumulative effects. As noted in the discussions of air quality and of transport, positive effects are anticipated from the proposed expansion of the SE Metro throughout the Cardiff Capital Region, including significant enhancements in Blaenau Gwent, particularly at Abertillery. This will make a contribution to a modal shift away from high emitting transport modes towards sustainable travel. However, regional growth along major road arteries, including the A465 Heads of the Valleys Road, could introduce additional road users at a local and regional scale.
- 9.167 The Cardiff City Deal states an ambition for the ten authorities in the Cardiff Capital Region to come together to deliver strategic solutions for the region, including in relation to renewable energy. The City Deal identifies that regional development will present opportunities to deliver "renewable energy-led regeneration and housing programmes". In this context there is theoretical potential for positive in-combination effects, particularly as larger-scale development offers a greater opportunity to incorporate low carbon energy, such as combined heat and power (CHP) schemes to support renewable energy and increased energy efficiency. It is recognised that development proposed through the adopted LDPs of Merthyr, Caerphilly, Monmouthshire and Torfaen is unlikely to offer potential for contiguous cross-boundary strategic development at a scale suitable to deliver CHP.

# 10. Summary appraisal findings for the Pre-Deposit replacement LDP

#### Introduction

10.1 This chapter provides a summary of the detailed appraisal findings for the Pre-Deposit RLDP set out in the preceding chapter.

## **Summary appraisal findings**

- 10.2 The ISA found that the Preferred Strategy has the potential for significant positive effects in relation to the economy and employment and population and communities ISA themes. It proposes a level of growth to meet the needs of communities during the plan period and distributes it according to the settlement hierarchy, the majority of growth being focussed at settlements where there is good access to sustainable transport modes and existing facilities/ services/ employment opportunities. Where possible, it takes advantage of opportunities being presented through the Cardiff City Deal and South East Wales Metro.
- 10.3 Three strategic mixed use sites are proposed through the Preferred Strategy, though site layouts remain unknown and no details are available in relation to smaller non-strategic sites. In this context the ISA was not able to predict or draw definitive conclusions in relation to the nature and significance of effects that are likely to arise in relation to biodiversity, the landscape, the historic environment, transport and natural resources. The appraisal highlighted the potential for both positive and negative effects dependent on the precise location of growth and scale of development at the sites. Candidate Sites will be considered through the ISA process in due course and the findings will inform the development of the Deposit Plan.
- 10.4 The ISA found that the Preferred Strategy has the potential for long term positive effects on themes relating to climate change, health and wellbeing and equalities, diversity and social inclusion. However, given the scale of growth it is unlikely that it would result in a residual significant effect.
- 10.5 Table 10.1 below sets out a summary of the appraisal findings for the Pre-Deposit RLDP 'as a whole' against each ISA theme.

Blaenau Gwent Replacement LDP

**Table 10.1: Summary appraisal findings** 

ISA theme	Commentary	Residual significant effect predicted at this stage?				
Economy and employment						
Population and communities	The Preferred Strategy proposes the delivery of 2,115 dwellings, of which at least 478 will be affordable, at the County's most sustainable settlements, with growth principally concentrated at three strategic mixed use sites at the north of the plan area at The Works, Ebbw Vale, the Northern Corridor and Nantyglo. The broad distribution of growth is supported by a number of policies which are likely to contribute to positive effects in relation to providing a range of homes in sustainable locations and enhancing design quality. Key messages from the relevant strategic policies include: establishing a preference for developing brownfield sites before greenfield; making land available for small and medium housebuilders to ensure supply is not simply coming from major developers on strategic sites; embedding opportunities to sustainably access local services and facilities into new development, and; aligning the development of new homes with the development of new employment land.	Yes - Positive				
Health and wellbeing	The Preferred Strategy presents opportunities to link new development with the existing walking, cycling and Green Infrastructure networks at each of the main settlements, whilst also offering potential to secure enhancements to these networks through the development process. Where possible, the Preferred Strategy supports growth at locations from which goods, services and local employment could potentially be reached via healthy travel options, subject to detailed matters of site design and layout. It also directs the majority of housing growth to settlements with the widest range of healthcare facilities and requires that such facilities are enhanced as necessary through the development process to continue to provide a high quality service. Although effects are predicted to be positive overall, it is considered unlikely that they will be significant given the scale of growth.	No				
Equalities, diversity and social inclusion	The strategic policies of the Preferred Strategy establish that enhancing access to key services of significance to tackling inequalities and deprivation, such as employment, training and healthcare, will be a priority for the RLDP. This includes a focus on improving access to service centres by sustainable modes of transport, and on designing new development so that multiple uses can be safely and conveniently accessed by all members of the community. Whilst efforts to reduce poverty and inequality, tackle social exclusion and promote community cohesion will clearly require a nuanced approach coordinated between a range of service providers, it is considered that the Preferred Strategy is likely to make a long term positive contribution to addressing the objectives of the equalities, diversity and social exclusion ISA theme, though the residual effect is unlikely to be significant.	No				
Transport and movement	By focussing growth at the Tier 1 and 2 settlements the Preferred Strategy directs the majority of new development to locations which are closest to public transport, local services, facilities and employment. This could help reduce the need to travel by car to meet some needs and could help facilitate walking and cycling. The strategic policies of the Preferred Strategy establish clear support for embedding walking and cycling connectivity into new development to link new homes and employment sites with services and facilities through active travel. Overall, there is potential for positive effects in relation to transport and movement though the degree of significance will be informed by the final design and layout of site allocations, particularly the strategic sites, as well as the extent to which active travel infrastructure is delivered through the final schemes.	Uncertain				

Blaenau Gwent Replacement LDP Initial ISA Report

ISA theme	Commentary	Residual significant effect predicted at this stage?				
Natural resources						
Biodiversity and geodiversity	The proposed distribution of growth through the Preferred Strategy could potentially see new development delivered in relatively close proximity to a number of designated sites. The HRA could not conclude no adverse effect on European sites at this stage until further evidence base work is carried out and the precise location of development is known. Development proposed through the preferred strategy has the potential for impacts on biodiversity that could have both positive and negative effects. The Preferred Strategy include policies that seek to protect and enhance biodiversity and geodiversity. Uncertain effects are identified at this stage as the nature and significance of effects are dependent on the precise location of development.	Uncertain				
Historic environment	As no specific sites/ allocations are identified at this stage, it is difficult to predict or draw any definitive conclusions with regards to the nature and significance of effects that are likely to arise in relation to the historic environment theme/ ISA objectives. There are a number of designated heritage assets within and surrounding the main settlements where the majority of growth is being directed. As a result, there is the potential for impacts on these sensitive receptors, including their setting. The Preferred Strategy includes policies that seek to protect and where possible enhance the landscape and historic environment. Taking the above into account, an uncertain effect is identified at this stage as the nature and significance of effects are dependent on the precise location and scale of growth. The Preferred Strategy is not likely to have any direct or significant effects on the Welsh language - indirectly the proposed delivery of housing and new jobs to meet needs as well as wider infrastructure has the potential for positive effects on the Welsh language but these are not likely to be significant.	Uncertain				
Landscape	Development proposed through the Preferred Strategy has the potential for both positive and negative effects on the landscape/ townscape, including special landscapes such as the National Park. Strategic policies aim to protect and enhance important landscape features/ areas; notably through protecting greenfield land outside settlement boundaries from inappropriate development. Uncertain effects are identified at this stage as the nature and significance of effects will ultimately be dependent on the precise location, design and layout of development.					
Climate change	It is considered that in line with national policy development can be located in areas of low flood risk and that suitable mitigation can be provided, although this is uncertain until the site locations are known. Although any scale of growth has the potential to increase emissions from the built environment to some extent, the limited scale of growth and its efficient use of available land (i.e. not expanding the built area overall) means that effects are unlikely to be significant. The key policies of the Preferred Strategy seek to minimise adverse effects in relation to flooding and to emissions, or mitigate these where avoidance is not realistic or practicable. Requirements to deliver high energy efficiency in all new development and in-principle support for low carbon energy generation are also established. Overall, minor long term positive effects are anticipated in relation to climate change, though the small scale of proposed development means that these effects are not considered likely to be significant overall.	No				

Part 3: What happens next?

# 11. Introduction (to Part 3)

11.1 The aim of this chapter is to explain next steps in the plan-making/ ISA process as well as monitoring.

# 12. Next Steps

- 12.1 This Initial SA Report will accompany the Pre-Deposit RLDP document for public consultation in January 2020. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and ISA process.
- 12.2 The representations received along with further evidence base work, including further ISA work, will inform the development of the Deposit RLDP which is scheduled to be published for consultation in 2020. An updated ISA Report will accompany the Deposit RLDP for consultation.

# 13. Monitoring

13.1 Monitoring measures will be established within the next version of the ISA Report to address the potential significant effects associated with the Deposit version of the plan. No measures have been identified at this stage, as the RLDP is yet to be finalised.

**Appendices** 

# **Appendix I: Regulatory requirements**

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table IA links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table IB explains this interpretation.

Table IA: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

	Questions answered		As	per the regulationsthe SA Report must include
	What's the plan seeking to achieve?		•	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
Introduction	What's the SA scope?	What's the sustainability 'context'?	•	Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	•	Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan  The environmental characteristics of areas likely to be significantly affected
			•	Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	•	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		•	Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)  The likely significant effects associated with alternatives  Outline reasons for selecting the preferred approach inlight of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Plan
Part 2	What are the SA findings at this current stage?		•	The likely significant effects associated with the Submission Plan  The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Submission Plan
Part 3	What happens next?		•	A description of the monitoring measures envisaged

#### Table IB: Questions answered by the SA Report, in accordance with regulatory requirements

#### Schedule 2

#### **Interpretation of Schedule 2**

#### The report must include...

## An outline of the contents, main

The report must include...

plans and programmes: 2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan

1. an outline of the contents, main objectives

of the plan and relationship with other relevant

the environmental characteristics of areas. likely to be significantly affected:

4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC:

5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;

6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;

8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information

9. a description of the measures envisaged concerning monitoring.

objectives of the plan and relationship with other relevant plans and programmes

i.e. answer - What's the plan seeking to achieve?

i.e. answer - What's the

SA?

answer – What's the scope of the

φį

'context'?

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

The relevant environmental protection objectives, established at international or national level

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'

The environmental characteristics of areas likely to be significantly affected

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

Key environmental problems / issues and objectives that should be a focus of appraisal

i.e. answer - What's the 'baseline'?

i.e. answer - What are the key issues & objectives?

An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)

The likely significant effects associated with alternatives. including on issues such as...

... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.

i.e. answer - What has Planmaking / SA involved up to

[Part 1 of the Report]

The likely significant effects associated with the draft plan

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan

i.e. answer - What are the assessment findings at this current stage?

[Part 2 of the Report]

A description of the measures envisaged concerning monitoring i.e. answer - What happens next?

[Part 3 of the Report]

Whilst Tables A and B signpost broadly how/where this report presents the information required of the SA Report by the Regulations, as a supplement it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table IC.

# Table IC: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

#### Regulatory requirement

#### Discussion of how requirement is met

#### Schedule 2 of the regulations lists the information to be provided within the SA Report

- An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;
- Chapter 2 ('What's the revised LDP seeking to achieve?') presents this information.

  The relationship with other plans and programmes is also set out in Appendix II (Scoping Information).
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
- These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2018.
- 3. The environmental characteristics of areas likely to be significantly affected;
- The outcome of scoping was an 'ISA Framework', and this is presented within Chapter 3 ('What's the scope of the SA').
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.:
- More detailed messages from the Scoping Report i.e. messages established through context and baseline review are presented within Appendix II.
- The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;

The Scoping Report (2018) presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'ISA framework'. A summary is provided in Appendix II of this SA Report.

The context review informed the development of the ISA framework and themes, presented in Chapter 3, which provide a methodological 'framework' for appraisal.

With regards to explaining "how... considerations have been taken into account" -

- Chapters 4 and 5 explains how reasonable alternatives were established in 2019 in-light of earlier consultation and evidence.
- Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives, with the detailed appraisal provided in Appendix III.
- Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
- Chapters 9 and 10 sets out the findings of the appraisal of the draft plan.
- 6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);
- Chapter 6 sets out the summary findings of the appraisal of the reasonable alternatives at this stage with the detailed appraisal provided in Appendix III.
- Chapters 9 presents the draft plan appraisal and the summary findings are provided in Chapter 10.

As explained within the various methodology sections, as part of appraisal work, consideration has been given to the ISA scope, and the need to consider the potential for various effect characteristics/ dimensions.

 The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme; Where necessary, the appraisal of the alternatives (Appendix III and Chapter 6) and the Preferred Strategy (Chapters 9 and 10) identify avoidance and/ or mitigation measures to reduce the significance of residual negative effects or to enhance residual positive effects. These will be explored further through the ISA of candidate sites and the Deposit Plan.

- 8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required
- Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.
- Description of measures envisaged concerning monitoring in accordance with Art. 10;

As explained in Chapter 13, monitoring measures will be set out in the ISA Report that accompanies the Deposit Plan.

10. A non-technical summary (NTS) of the information provided under the above headings

The NTS is provided in a separate document.

## The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this ISA Report is published alongside the Preferred Strategy Document so that representations might be made ahead of the Deposit

## The SA Report must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the Report when finalising the Preferred Strategy for results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Council has taken into account the Initial ISA publication. Further SA work will be carried out to inform the development of the Deposit Plan.

Blaenau Gwent Replacement LDP Initial ISA Report

## **Appendix II: Scoping information**

## **Review of Plans, Programmes and Policies**

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
1. Population (including relevant socio	-economic issues)		
International			
<ul> <li>United Nations (2016) Habitat III (Quinto)</li> <li>United Nations Economic Commission for Europe (1998)</li> <li>The Aarhus Convention</li> </ul>	These documents provide an international framework for promoting sustainable development within all decision making. National and local developments should take sustainability into account and openly share relevant information with the public.	and proposals which promote sustainable development and	suite of assessment criteria to determine the contribution of any replacement LDP to the
European – all legislative and policy frameworks are inform			
<ul> <li>European Commission (2003) Public Sector Information Directive (PSI) 2003/98/EC</li> <li>European Commission (2010) Europe 2020: A strategy for smart, sustainable and inclusive growth, Growth within: A Circular Economy Vision for a Competitive Europe</li> <li>European Commission (2013) Towards Social Investment for Growth and Cohesion 2014-2020</li> <li>McKinsey Centre for Business and Environment (2015)</li> </ul>		The revised LDP should set out policies and proposals for relevant socio-economic issues as outlined in the European Policies.	The SA Framework should include objectives to facilitate positive growth for the economy and improving social cohesion.
National (UK) - all legislative and policy frameworks are in	formed by relevant higher level European and internation	onal frameworks	

F	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	The Enterprise and Regulatory Reform Act 2013 The Plan for Growth (BIS, 2011) Equality Act 2010, Local Growth: Realising every Place's potential (BIS, 2010) HM Government (2013) Aviation Policy Framework	These documents provide a framework at the UK level to promote strong, sustainable and balanced growth across all economies. They aim to encourage investment and create an equal opportunity environment.		designated by national policy.
١	ational (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK, European and in	ternational frameworks	
	Well Being of Future Generations (Wales) Act 2015 Housing (Wales) Act 2014 Growth and Competitiveness Commission (2016) Cardiff Capital Region City Deal – Report and Recommendations Welsh Government Valleys Task Force Our Valleys, Our Future (July 2017) Welsh Government Future Trends Report (2017) The Strategy for Older People in Wales: Living Longer, Ageing Well (2013-2023) (Welsh Government) Social Services and Well-being (Wales) Act 2014 Welsh Government (2007) One Wales – A Progressive Agenda for the Government of Wales Welsh Government (2009) Getting On Together - a Community Cohesion Strategy for Wales Welsh Government (2009) Improving Lives and Communities – Homes in Wales	These policies are informed by International, European and UK policies and broadly focus on progressive agendas for increasing economic growth and enhancing social well-being in Wales.	The revised LDP should set out policies and proposals relating to relevant	relating to the creation of acceptable policies
•	` ,			

	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for	Key Implications for SA
	<ul> <li>Welsh Government (2013) Partnership for Growth: The Welsh Government Strategy for Tourism 2013 – 2020</li> <li>Welsh Government (2013) Vibrant and Viable Places New Regeneration Framework</li> <li>Welsh Government (2013) The Strategy for Older People in Wales 2013-2023</li> <li>Welsh Government (2013) Framework for Action on Independent Living</li> <li>Welsh Government (2014) Declaration of Rights for Older People</li> <li>Welsh Government (2014) Housing (Wales) Act 2014</li> <li>Welsh Government (2015) Green Growth Wales: Investing in the Future</li> <li>Welsh Government (2015) Child Poverty Strategy for Wales</li> <li>Welsh Government (2015) Volunteering Policy, Supporting Communities, Changing Lives</li> <li>Welsh Government (2016) Strategic Equalities Plan</li> <li>Welsh Government (2016) Social Services: The national outcomes framework for people who need care and support and carers who need support</li> <li>Welsh Government (2016) Early Years Outcomes Framework</li> <li>Welsh Government (2017) Prosperity for All :The National Strategy</li> <li>Welsh Government 2015/16 Review of evidence of inequalities in Wales</li> </ul>	Requirements	LDP	
	<ul> <li>Welsh Government Future Trends Report (2017)</li> <li>Welsh Government Population and Household Projections (2017)</li> </ul>			
L	Wales National Planning Policy			
	<ul> <li>Welsh Government Planning Policy Wales (Edition 9, November 2016)</li> <li>Welsh Government (2015) Technical Advice Note 1: Joint Housing Land Availability Studies</li> <li>Welsh Government (2006) Technical Advice Note (TAN) 2: Planning and Affordable Housing</li> <li>Welsh Government (2016) Technical Advice Note (TAN) 4: Retail and Commercial Development</li> <li>Welsh Government (2010) Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities</li> </ul>	planning policy of the Welsh Government. Planning Policy Wales (PPW) sets out the land	The revised LDP should provide policies, proposals, advice and guidance relating to relevant socio-economic and population issues within Blaenau Gwent.	The SA Framework should include objectives relating to socio-economic issues including economic competitiveness and economic growth, employment provision, social wellbeing, housing and open space.

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
<ul> <li>Welsh Government (2013) Technical Advice Note (TAN 13: Tourism</li> <li>Welsh Government (2009) Technical Advice Note (TAN 16: Sport, Recreation and Open Space</li> <li>Welsh Government (2014) Technical Advice Note (TAN 23: Economic Development</li> </ul>	development into the planning system so that it can play an appropriate role in moving towards sustainability.  The planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development. They should aim to:  • co-ordinate development with infrastructure provision;  • support national, regional, and local economic policies and strategies;  • align jobs and services with housing, wherever possible, so as to reduce the need for travel, especially by car; and  • promote the re-use of previously developed, vacant and underused land.		
Regional Plans			
<ul> <li>Welsh Government Tech Valleys Strategic Plan (Apri 2018)</li> <li>Welsh Government Our Valleys, Our Future Delivery Plar (November 2017)</li> </ul>	2018) builds on the Vision Statement published in December 2017. The purpose of the plan is to set out how innovative technologies will be attracted to Ebbw Vale and the South Wales valleys. The plan also includes how it will complement other initiatives and the expected economic benefits.	employment opportunities.	
Local (BGCBC & Neighbouring Local Authorities) - all leg			
<ul> <li>Blaenau Gwent Local Development Plan (2012)</li> <li>Blaenau Gwent Well Being Assessment (2017)</li> <li>Blaenau Gwent Well-being Plan 2018-2023 (2018)</li> <li>Blaenau Gwent Corporate Plan 2018-2022</li> </ul>	The adopted Blaenau Gwent Local Development Plan and other local policies and plans regarding socio economic issues broadly address the following themes:  Create a network of sustainable vibrant valley communities	provide land use policies,	The SA Framework should include objectives in relation to economic growth, employment, skills and

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
<ul> <li>More than Homes – A Local Housing Strategy for Blaenau Gwent 2014-2018</li> <li>Blaenau Gwent Destination Management Plan 2016-19</li> <li>Blaenau Gwent Investment Prospectus (2017)</li> <li>Blaenau Gwent Welsh in Education Strategic Plan 2017-2020</li> <li>Blaenau Gwent Strategy for Older People 2015-2017</li> <li>Blaenau Gwent Supporting People Local Commissioning Plan 2018/2021</li> <li>Blaenau Gwent Regeneration and Economic Development Baseline Report 2017-18</li> </ul>	and promote learning and skills  Create safe, healthy and vibrant communities The Blaenau Gwent Well-being Assessment (2017)	Blaenau Gwent. These should include policies for employment	education, tourism, health, equality and social inclusion.

P	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
		of local businesses and attract new inward investment; develop digital infrastructure and improve connectivity; develop a portfolio of potential energy opportunities; and develop a new vision for town centres ensuring their long term future.		
•	Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012 Brecon Beacons National Park Local Development Plan – adopted Dec 2013 Torfaen County Borough Council Local Development Plan - adopted Dec 2013 Powys County Council Local Development Plan –adopted April 2018 Caerphilly County Borough Council Local Development Plan –adopted November 2010	The LDPs set out the land-use planning framework for neighbouring local authorities.	that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and	
2.	Air			
In	ternational			
•	Geneva Convention on Long Range Transboundary Air Pollution (1979)	The aim of the Convention is that Parties shall endeavour to limit and, as far as possible, gradually reduce and prevent air pollution including long-range transboundary air pollution. Parties develop policies and strategies to combat the discharge of air pollutants through exchanges of information, consultation, research and monitoring.	policies, proposals to improve air	The SA Framework should include objectives relating to improving air quality and associated health impacts and to minimise air pollution in new development.
E	uropean – all legislative and policy frameworks are inform	ned by relevant higher level international frameworks		
•	European Commission (2001) National Emissions Ceiling Directive 2001/81/EC European Commission (1991) The Nitrates Directive 91/676/EEC European Commission (2005) EU Thematic Strategy on Air Quality European Union (2005) Emissions Trading Scheme European Commission (2008) Ambient Air Quality and Cleaner Air for Europe Directive 2008/50/EC and Air	protect and enhance air quality. These include measures	policies, proposals to improve air quality and reduce pollution and to	

F	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	Quality Framework Fourth Daughter Directive 2004/107/EC 1 European Commission (2010) Industrial Emissions Directive (integrated pollution prevention and control) (Directive 2010/75/EU) European Commission (2001) The Clean Air for Europe Programme (CAFÉ)			
N	ational (UK) - all legislative and policy frameworks are inf			
•	The Environment Act (1995) The Air Quality Standards Regulations (2010) as amended, Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Defra (2010) Air Pollution: Action in a Changing Climate Defra (2011) Air Quality Plans for the Achievement of EU Air Quality Limit Values for Nitrogen Dioxide (NO2) in the UK: List of UK and National Measures UK's Air Quality Action Plan (Defra, revised January 2016), Revised UK Air Quality Plan for Tackling Nitrogen Dioxide (Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities) (Consultation Draft May 2017)	These documents provide a UK framework to implement objectives that promote the reduction of the levels of air pollution such as Nitrogen Dioxide.		The SA Framework should include objectives relating to protection of and improvement of air quality and associated health impacts and to minimise air pollution in new development.
N	lational (Wales) - all legislative and policy fran	neworks are informed by relevant higher leve	el UK, European and internatio	nal frameworks
•	Air Quality Standards (Wales) Regulations (2010) Welsh Government (2018) Consultation Document 'Tackling roadside nitrogen dioxide emissions in Wales'	These regulations bring into law in Wales the limits set out in European Union (EU) Daughter Directives on Air Quality. The regulations require that Welsh Ministers divide Wales into air quality zones. There are two zones: North and South Wales. It provides a Wales framework for the protection and improvement of air quality in accordance with limits set within European legislation.	and proposals for the preservation of	The SA Framework should include objectives relating to protection of air quality and air pollution controls, and acceptable air quality levels for protection of human health purposes.
٧	Vales National Planning Policy			
•	Welsh Government Planning Policy Wales (2016, Edition 9)	These documents provide national planning policy in respect of air. Development plans are important vehicles for the promotion of environmental protection and should enable consideration of the effects which proposed developments, and transport demand associated with them, may have on air or water quality and the effects which air or water quality may have on proposed developments. Local planning authorities should take account of such quality objectives when preparing development plans and should work closely with pollution control authorities in the preparation of these plans and	policies and proposals relating to air	

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	when determining planning applications. The planning system should determine whether a development is an acceptable use of land and should control other development in proximity to potential sources of pollution rather than seeking to control the processes or substances used in any particular development.		
Regional			
• N/A			
Local			
Blaenau Gwent Air Quality Progress Report 2017	This report fulfils the requirements of the Local Air Quality Management (LAQM) process as set out in the Environment Act 1995 and associated government guidance. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas and to determine whether or not the air quality objectives are being achieved. Where exceedances occur, or are likely to occur, the local authority must then declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) within 18 months of declaration setting out the measures it intends to put in place in pursuit of the objectives. Action plans should then be reviewed and updated where necessary at least every 5 years. This Progress Report does not identify the need for Blaenau Gwent to proceed to a detailed assessment for any of the seven pollutants identified in the UK's National Air Quality Strategy.	promote measures to reduce air pollution and improve air quality. Development plan policies should take account of national air quality objectives. The development plan policies on air quality should be informed by Planning Policy Wales, which in line with the current draft recently consulted upon will approach air quality more robustly in the light of The Well-being of Future Generations	that seek to reduce air pollution and to maintain air quality or seek improvements
3. Biodiversity, Flora & Fauna			
International			
Wild Animals (1979) The Bonn Convention		proposals and advice for the avoidance	that seek the conservation and enhancement

Pla	ans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	UNESCO (1973) Convention on International Trade in Endangered Species of Wild Fauna and Flora United Nations (1992) The Rio Convention on Biodiversity			
•	United Nations (1992) The Rio Declaration on Environment and Development			
•	EU Biodiversity Strategy – Our Life Insurance, Our Nature Capital: An EU Biodiversity Strategy (2011)			
Eu	ropean – all legislative and policy framework	ks are informed by relevant higher level inter	rnational frameworks	
•	Council of Europe (1981) Convention on the Conservation of European Wildlife and Natural Habitats - The Bern Convention, European Union (2001) SEA Directive (2001/42/EC) European Commission (2004) Environmental Liability Directive 2004/35/EC, European Commission — EU Directive on the conservation of natural habitats and of wild fauna and flora European Commission - EU Birds Directive (Directive 2009/147/EC/ on the conservation of wild birds), , EU Biodiversity Strategy - Our Life Insurance, Our Nature Capital: An EU Biodiversity Strategy (2011-2020), European Commission (2008) Environmental Quality Standards Directive 2008/105/EC	These policies provide a European framework to protect sites designated at the European level for reasons of biodiversity conservation and important species from harm.	and, proposals for the protection of	The SA Framework should include appropriate objectives to assess potential habitat loss, recreational impacts, water abstraction, pollution and disturbance effects from policies, proposals, advice and guidance contained within any revised LDP.
Nati	ional (UK) - all legislative and policy frameworks are in	formed by relevant higher level European and internation	onal frameworks	
•	HM Government (1981) Wildlife and Countryside Act HM Government (1990) Environmental Protection Act HM Government (1995) Environment Act 1995 The Protection of Badgers Act 1992 Countryside and Rights of Way Act 2000 Natural Environment and Rural Communities Act (2006) Defra (2007) Conserving Biodiversity the UK Approach 2007 Defra, Scottish Government, Welsh Assembly Government (2008) The Invasive and Non-Native Species Framework Strategy for Great Britain Strategic Plan for Biodiversity 2011-2020 (2010) HM Government (2010) Environmental Permitting (England and Wales) Regulations HM Government (2010) The Conservation of Habitats and Species Regulations (2010) as amended (2011)	These documents provide a framework at the UK level to provide protection for protected species and habitats.		relating to national policy on the protection of

P	ans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	UK National Ecosystem Assessment (2011) UK National Ecosystem Assessment: Understanding Nature's Value to Society The UK Post 2010 Biodiversity Framework (JNCC, 2012), Joint Nature Conservation Committee and Defra (2012) UK Post-2010 Biodiversity Framework The Natural Environment White Paper (DEFRA, 2012), The Conservation of Habitats and Species Regulations), 25 Year Environment Plan (UK Government, 2018)			
	,			
Na	tional (Wales) - all legislative and policy frameworks are		ternational frameworks	
•	Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009 Welsh Assembly Government (2009) Woodlands for Wales Strategy Wales Biodiversity Partnership (2010) Wales Biodiversity Framework Welsh Assembly Government (2015) The Nature Recovery Plan for Wales – Setting the course for 2020 and beyond National Assembly for Wales Environment (Wales) Act, 2016	to protect biodiversity interests, including designated sites and important species.	The revised LDP should set out policies and proposals for the protection of biodiversity, flora and fauna.	The SA Framework should include objectives relating to the preservation, protection and conservation of biodiversity.
W	ales National Planning Policy			
•	Welsh Government (2016) Planning Policy Wales (Edition 9) Welsh Government (2009) Technical Advice	policy in respect of Biodiversity. Development		The SA Framework should include objectives relating to the protection, enhancement and conservation of biodiversity.

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	<ul> <li>provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity;</li> <li>make appropriate provision for Local Nature Reserves;</li> <li>include, where appropriate, locally-specific policies for conserving native woodland and protecting and planting trees;</li> <li>clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate;</li> <li>provide for the protection and enhancement of open space of conservation value, seeking to identify opportunities to promote responsible public access for enjoyment and understanding of the natural heritage where this is compatible with its conservation and existing land uses; and</li> <li>recognise the potential of, and encourage land uses and land management practices that help to secure carbon sinks.</li> </ul>		
Regional			
N/A			

Local (BGCBC & Neighbouring Local Authorities) - all legislative and policy frameworks are informed by relevant higher level Welsh, UK, European and international frameworks

P	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	Blaenau Gwent Local Biodiversity Action Plan 2015 Blaenau Gwent Public Service Board Well-being Assessment (2017) Blaenau Gwent Public Service Board Well Being Plan for Blaenau Gwent 2018-2033	importance of biodiversity conservation	The revised LDP should set out policies and proposals to protect and enhance biodiversity, flora and fauna.	The SA Framework should include objectives relating to conservation, protection and enhancement of biodiversity interests.
•	Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012 Brecon Beacons National Park Local Development Plan – adopted Dec 2013 Torfaen County Borough Council Local Development Plan - adopted Dec 2013 Powys County Council Local Development Plan –adopted April 2018 Caerphilly County Borough Council Local Development Plan –adopted November 2010	The LDPs set out the land-use planning framework for neighbouring local authorities.	that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency. This includes potential enhancements to those designated and non-	The SA should seek to ensure that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency. This includes potential enhancements to those designated and non-designated natural environment sites (landscape, biodiversity and heritage) and other networks that cross LA boundaries.

	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
			environment sites (landscape, biodiversity and heritage) and other networks that cross LA boundaries.	
4	4. Soil			
I	International			
-	▶ N/A			
E	European – all legislative and policy frameworks are inforn			
	<ul> <li>European Commission (2006) European Thematic Strategy on Soil Protection European Commission (2006)</li> <li>Environmental Liability Directive 2004/35/EC</li> </ul>	These documents provide a European framework to promote the sustainable use of soil resources, soil restoration and the prevention of land degradation.	policies, proposals, and guidance for	The SA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.
1	National (UK) - all legislative and policy frameworks are inf	ormed by relevant higher level European and internation	onal frameworks	
	<ul> <li>Guiding Principles for Land Contamination</li> <li>HM Government (1986) Agriculture Act (with numerous revisions) 1986</li> </ul>	These documents provide a framework at the UK level to identify and remediate contaminated land, as well as regarding the management of agricultural land.	policies, proposals, advice and guidance for the protection of	The SA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.
1	National (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK, European and in	ternational frameworks	
	<ul> <li>Joint Nature Conservation Committee (ongoing) Geological Conservation Review</li> <li>Welsh Assembly (2012) Contaminated Land (Wales) (Amendment) Regulations 2012</li> <li>Environment (Wales) Act (2016)</li> <li>The Nitrate Pollution Prevention (Wales) Regulations (2016)</li> </ul>	These documents provide a framework at the Welsh level regarding the avoidance and remediation of contaminated land and the creation of a geological profile of Wales.	policies, proposals, advice and guidance for local developments which	The SA Framework should include objectives relating to contaminated land remediation, soil quality and pollution to ground receptors. Consequential human health and ecological risks and impacts should also be considered in a holistic manner.
١	Wales National Planning Policy			
	<ul> <li>Welsh Government (2016) Planning Policy Wales (Edition 9)</li> </ul>	<ul> <li>This document requires the preparation of LDPs to:</li> <li>Take account of the physical and environmental constraints on development of land, including, for example, the level of contamination and stability</li> </ul>	provide policies, proposals, advice and guidance relating to the safeguarding and efficient	safeguarding and efficient use of

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	<ul> <li>Ensure new development is not undertaken without an understanding of the risks, including those associated with the previous land use, mine and landfill gas emissions, and rising groundwater from abandoned mines;</li> <li>Ensure new development does not take place without appropriate remediation;</li> <li>Ensure consideration is given to the potential impacts which remediation of land contamination might have upon the natural and historic environments;</li> <li>Ensure new development is not undertaken without an understanding of the risks, including those associated with subsidence, landslips or rock falls;</li> <li>Ensure development does not take place without appropriate precautions;</li> <li>Take account of coastal / land erosion risks; and</li> <li>Seek to restore unstable and contaminated land.</li> </ul>		
Regional			
• N/A			
Local (BGCBC & Neighbouring Local Authoritic international frameworks	es) - all legislative and policy frameworks are	e informed by relevant higher l	evel Welsh, UK, European and
Blaenau Gwent Contaminated Land Strategy (2002)	The main objective of the strategy under the Part IIA regime is to provide an improved system for the identified and remediation of land, where contamination is causing unacceptable risks to human health or the wider environment.	use policies, proposals and guidance to	The SA Framework should include objectives relating to contaminated land.
5. Water			
International			

P	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	United Nations (1982) Convention on Law of the Sea	This convention demonstrates the rights and responsibilities of nations for fair use of the world's oceans.		The SA Framework should include objectives relating to the impact of development on rivers.
E	ropean – all legislative and policy frameworks are inform	ned by relevant higher level international frameworks		
•	European Commission (1991) The Urban Waste Water Directive 91/271/EEC European Commission (1998) The Drinking Water Directive 98/83/EC European Commission (2000) The Water Framework Directive (Directive 2000/60/EC) European Commission (2006) The Bathing Waters Directive 2006/7/EC European Commission (2006) Groundwater Directive 2006/118/EC European Commission (2007) The Floods Directive 2007/60/EC European Commission (2008) Marine Strategy Framework	seeks to protect the quality of the water environment, including through ensuring safe levels for bathing and drinking water and by promoting sustainable urban	for mitigating flood risk, protecting the	The SA Framework should include objectives relating to the quality of the water environment and water resources, as well as to manage flood risks.
	Directive 2008/56/EC			
N	ational (UK) - all legislative and policy frameworks are in	<u> </u>		
•	HM Government (1973) The Protection of Wrecks Act 1973 HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations Change DEFRA (2005) Safeguarding Sea Life The Pitt Review Environment Agency (2005) Cleaner Coasts , Healthier Seas: EA Marine Strategy HM Government (2007) Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended 2010) Department for Transport (2007) Ports Policy Review Interim Report Learning Lessons from the 2007 Floods (2008) Flood and Water Management Act (2010), Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries HM Government (2009) Flood Risk Regulations Defra (2009) Our Seas – a Shared Resource: High Level Marine Objectives	regarding flood risk management and the protection of		The SA Framework should include objectives relating to flood risk mitigation.

I	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	HM Government (2009) The Marine and Coastal Access			
	Act HM Government (2010) Flood and Water Management Act			
	2010			
ľ	<ul> <li>HM Government (2010) Marine Strategy Framework Directive - putting in place the legal framework for implementation</li> </ul>			
١.	DECC (2010) Marine Energy Action Plan			
•	<ul> <li>DEFRA (2010) Adapting to Coastal Change: Developing a Policy Framework</li> </ul>			
•	NERC (2010) Marine Environmental Mapping Programme (MAREMAP)			
•	UK Marine Monitoring and Assessment Strategy (2010) Charting Progress 2: The State of UK Seas			
•	Welsh Government (2011) Strategic Policy position on Water			
١.	DEFRA (2011) Marine Policy Statement			
•	Department for Transport (2011) National Policy Statement for Ports			
١,	NI Executive, Scottish Government, Welsh Assembly			
	Government (2011) UK Marine Policy Statement, Inshore			
١.	Fisheries and Conservation Authorities Bylaws (various) Natural England and JNCC (2011) Marine Conservation			
	Zone (MCZ) Project			
•	Defra (2012) Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status			
١,	Environment Agency (2013) Groundwater Protection			
	Policy and Practice (GP3)			
•	Healthier Seas: EA Marine Strategy 2017			
ı	National (Wales) - all legislative and policy frameworks are			The OA Francisco de la la charle de la la charle de la ch
1	HM Government (1973) The Protection of Wrecks Act 1973,	regarding flood risk management and the protection of		The SA Framework should include objectives relating to the quality of water environment
١.	HM Government (2003) The Water Environment	water and coastal environments.	management of flood risk.	and managing flood risk.
•	HM Government (2003) The Water Environment (Water			
	Framework Directive) (England and Wales) Regulations 2003			
١.	Welsh Government (2004) Technical Advice Note 15:			
	Development and Flood Risk			
ľ	<ul> <li>Environment Agency (2005) Cleaner Coasts, Healthier Seas: EA Marine Strategy</li> </ul>			
•	Defra (2005) Safeguarding Sea Life Welsh Government			
	(2007)			

Department for Transport (2007) Ports Policy Review Interim Report,     Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries	
Defra (2007) Fisheries 2027: A long-term vision for sustainable fisheries	
sustainable fisheries	
T. BU. B. I. I. I. I. A. A. BOOT T. I.	
The Pitt Review: Learning Lessons from the 2007 Floods (2008)	
Welsh Water (2008) Surface Water Management Strategy	
HM Government (2009) The Marine and Coastal Access     Act	
Defra (2009) Our Seas – a Shared Resource: High Level     Marine Objectives	
HM Government (2009) Flood Risk Regulations	
Defra (2010) Adapting to Coastal Change: Developing a Policy Framework	
DECC (2010) Marine Energy Action Plan	
Flood and Water Management Act (2010)	
HM Government (2007) Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended	
2010)	
UK Marine Monitoring and Assessment Strategy (2010)     Charting Progress 2: The State of UK Seas	
NERC (2010) Marine Environmental Mapping Programme (MAREMAP)	
HM Government (2010) Marine Strategy Framework	
Directive - putting in place the legal framework for	
implementation, HMG, NI Executive, Scottish	
Government, Welsh Assembly Government (2011)  • Welsh Government (2011) Strategic Policy Position on	
Water	
Natural England and JNCC (2011) Marine Conservation Zone (MCZ) Project	
Department for Transport (2011) National Policy     Statement for Ports	
Defra (2012) Marine Strategy Part 1: UK Initial Assessment and Good Environmental Status	
Welsh Government (2013) Wales Marine and Fisheries     Strategic Action Plan	
Environment Agency (2013) Groundwater Protection Policy and Practice (GP3)	
Welsh Water (2014) Final Water Resources Management	
Plan  Environment Agency (2015) The Severn River Basin Management Plan	

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
<ul> <li>Welsh Government (2015) Water Strategy for Wales</li> <li>Welsh Government (2015) Wales Marine Evidence Report</li> <li>Welsh Government Environment Act 2016</li> <li>(Water Framework Directive) (England and Wales) Regulations 2017</li> <li>UK Marine Policy Statement, Inshore Fisheries and Conservation Authorities Bylaws (various)</li> </ul>			
Wales National Planning Policy			
<ul> <li>Welsh Government (2016) Planning Policy Wales (2016) (Edition 9)</li> <li>Welsh Government (1998) Technical Advice Note (TAN) 14: Coastal Planning</li> <li>Welsh Assembly Government (2004) Technical Advice Note (TAN) 15: Development and Flood Risk</li> </ul>	flooding. The general approach of PPW, supported by the TAN, is to advise caution in respect of new development in areas at high risk of flooding by setting out a	policies and proposals relating to the precautionary approach to flood risk, protection and enhancement of water quality, water resources and the water environment.	risk, protection and enhancement of water quality, water resources and the water

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA			
Regional	Regional					
• N/A						
Local (BGCBC & Neighbouring Local Authorities) – all legi	slative and policy frameworks are informed by relevant	higher level Welsh, UK, European and	d international frameworks			
Blaenau Gwent Flood Risk Management Strategy (May 2013)	In line with the flood risk regulations BGCBC were required to develop, maintain, apply and monitor a Strategy for Local Flood Risk Management. This document – Blaenau Gwent County Borough Council – Flood Risk Management Strategy sets out to satisfy the requirements of the Flood and Water Management Act 2010.  The strategy includes the following:  • the Risk Management Authorities in Blaenau Gwent;  • the flood risk management functions that may be exercised by those Authorities in relation to the area;  • the objectives for managing Local Flood Risk;  • the measures proposed to achieve those objectives;  • how and when the measures are expected to be implemented;  • the potential costs and benefits of those measures;  • the assessment of local flood risk for the purpose of the strategy;  • how and when the Strategy is to be reviewed; and  • how the Strategy contributes to the achievement of wider environmental objectives.	a precautionary approach to development and flood risk in the LDP strategy. The approach to the location of new development should avoid areas where risks of flooding are unacceptable and cannot be mitigated.	The SA Framework should include objectives relating to mitigating and managing flood risk			
Blaenau Gwent Flood Risk Management Plan (FRMP) (2015)	This Flood Risk Management Plan sets out how Blaenau Gwent County Borough Council will over the next 6 years manage flooding so that the communities most at risk and the environment benefit the most. In doing so, this FRMP takes forward the objectives and actions set out in the Flood Risk Management Strategy.  This FRMP also aims to achieve some of the objectives set out in the Welsh Government's National Flood and Coastal Erosion Risk Management Strategy which provides the national framework for flood and coastal erosion risk management in Wales through four overarching objectives:  Reducing the consequences for individuals, communities, businesses and the environment from flooding and coastal erosion.	should inform a precautionary approach to development and flood risk in the LDP strategy. The approach to the location of new development should avoid areas where risks of flooding are unacceptable and cannot				

F	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
		<ul> <li>Raising awareness of and engaging people in the response to flood and coastal erosion risk.</li> <li>Providing an effective and sustained response to flood and coastal erosion events.</li> <li>Prioritising investment in the most at risk communities</li> </ul>		
•	Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012 Brecon Beacons National Park Local Development Plan – adopted Dec 2013 Torfaen County Borough Council Local Development Plan – adopted Dec 2013 Powys County Council Local Development Plan –adopted April 2018 Caerphilly County Borough Council Local Development Plan –adopted November 2010	The LDPs set out the land-use planning framework for neighbouring local authorities.	that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that	The SA should seek to ensure that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency.
6	. Material Assets			
li	nternational			
•	United Nations (1989) Basel Convention		policies, proposals, advice and	The SA Framework should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility.
E	uropean – all legislative and policy frameworks are inform	=		
	European Commission (1999) Landfill Directive (1999/31/EC) European Commission (2002) Environmental Noise Directive (END) 2002/49/EC European Commission (2002) Mineral Waste Directive 2006/21/EC European Commission (2003) Public Sector Information Directive (PSI) 2003/98/EC European Commission (2004) Environmental Liability Directive 2004/35/EC European Commission (2008) Waste Framework Directive 2008/98/EC European Commission (2011) Roadmap to a Single European Transport Area Towards a Circular Economy: A Zero Waste Programme for Europe (2014)	move toward a circular economy on waste. All EU member states will have new recovery and recycling targets at 5 year intervals Some important targets by 2020:  Reduction of level of biodegradable waste sent to landfills will have to be reduced by 35% compared to 1995 levels.	and proposals promoting sustainable waste management and the proper	The SA Framework should include objectives relating to resource efficiency, land use, and waste management.

P	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	EU Directive on the Incineration of Wastes EU Waste Oil Directive EU Energy Performance of Buildings Directive (Directive 2018/844	should include objectives relating to resource efficiency, land use, waste management, energy, connectivity and accessibility.		
•	European Commission (2002) Mineral Waste Directive 2006/21/EC			
Na	ational (UK) - all legislative and policy frameworks are inf	ormed by relevant higher level European and internation	onal frameworks	
	HM Government (1995) Environment Act 1995, Waste and Emissions Trading Act 2003 (Amended) The Hazardous Waste Regulations 2005 (England and Wales Landfill Regulations 2002 (England and Wales, amended 2005) Meeting the Energy Challenge: A White Paper on Energy (DECC, 2007), Department for Transport (2008) Delivering a Sustainable Transport System HM Government (2010) Environmental Permitting (England and Wales) Regulations HM Government (2010) Waste (Wales) Measure 2010 The UK Renewable Energy Strategy (2009) HM Treasury (2011) UK Plan for Growth The Waste Regulations 2011 (England and Wales) DEFRA (2013) Reducing and Managing Waste Policy DEFRA, 2013, Waste Incineration (England and Wales) Regulations 2002 HM Treasury (2014) National Infrastructure Plan The Environmental Permitting (England and Wales) (Amendment) Regulations 2016 National Planning Policy for Waste (DCLG, 2014) The Waste Electronic Equipment (Amendment) Regulations SI 2010/1155 amending The Waste Electrical and Electronic Equipment (WEEE) (Waste Management	These documents provide a framework at the UK level regarding infrastructure development, environmental permitting, waste management and energy generation		
N:	Licensing) (England and Wales) Regulations 2006,) ational (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK. European and in	ternational frameworks	
•	Welsh Government (2008) One Wales: Connecting the	These documents provide a Welsh Policy framework for		The SA Framework should include objectives
•	Nation, Welsh Assembly Government (2008) Sustainable Development Commission (2009) Low Carbon Wales Wales Transport Strategy, Welsh Government (2010) Towards Zero Waste One Wales: One Planet. The Overarching Waste Strategy Document for Wales	the protection of natural resources, infrastructure	policies and proposals for the enhancement and protection of	relating to waste regulations, protection of natural resources, resource management, infrastructure development strategy, and green growth.

I	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	<ul> <li>Welsh Government (2012) Sustaining a Living Wales: A Green Paper on a New Approach to Natural Resource Management in Wales</li> </ul>			
•	<ul> <li>Welsh Government (2012) Wales Infrastructure Investment Plan</li> </ul>			
	Welsh Government (2013) Active Travel (Wales) Act Cardiff Capital Region (2015) Powering the Welsh			
١.	Economy, Active Travel Act (Wales) 2013			
	Natural Resources Wales (2015)			
•	<ul> <li>LIFE Natura 2000 Programme for Wales Natural Resources Wales (2016)</li> </ul>			
	State of Natural Resources Report (SoNaRR), Welsh Government (2015) Green Growth Wales: Local			
'	Energy			
•	<ul> <li>Welsh Government (2016) Active Travel Action Plan for Wales</li> </ul>			
•	Welsh Government (2016) Energy Efficiency in Wales: A			
١.	Strategy for the Next 10 years 2016-2026 Welsh Government (2017) Natural Resources Policy			
١	Vales National Planning Policy			
•	Welsh Government (2016) Planning Policy			The SA Framework should include objectives relating to promotion of a sustainable
	Wales (Edition 9)	policy and guidance in respect of transport,	sustainable transport infrastructure	transport hierarchy, infrastructure
	<ul> <li>Welsh Government (2002) Technical Advice Note (TAN) 19: Telecommunications</li> </ul>	preparation of the LDP:	development, waste management and the sustainable use of natural	development, waste management and the sustainable use of natural resources.
	Welsh Government (2004) Minerals	The Welsh Government supports a	resources.	
•	• Welsh Government (2007) Technical Advice	transport hierarchy in relation to new		
	Note (TAN) 18:	development that establishes priorities in		
•	<ul> <li>Transport Technical Advice Note (MTAN)</li> <li>Wales 1: Aggregates Welsh Government</li> </ul>	such a way that, wherever possible, they are accessible in the first instance by		
	(2004)	walking and cycling, then by public		
•	Welsh Government (2009) Minerals Technical	transport and then finally by private motor		
	Advice Note (MTAN) Wales 2: Coal	vehicles. Careful consideration needs to be		
•	Welsh Government (2014) Technical Advice	given to the allocation of new sites which are likely to generate significant levels of		
	Note (TAN) 21: Waste	movement in Local Development Plans to		
		ensure that access provisions which		
		promote walking and cycling, as well as by		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	public transport are included from the outset.  Development plan strategies and policies need to be consistent and integrated with the strategies and policies contained LTPs, Road Traffic Reduction Reports, a quality and noise action plans and lock well-being plans, and take account information from the local authority annual air quality reports, national noise maps, the public service board assessment of local wellbeing and any are statements issued by Natural Resource Wales under the Environment (Wales) A 2016. Any LTP proposal that direct involves the development or use of land, that land use implications, should appears a policy or proposal in the development plan.  Ensure that transport centred project undergo an assessment in accordance with the Welsh Transport Appraisal Guidance (WelTAG).  Development plans provide the matemate for achieving integration between land use and transport. They must provide an explanation of the authority's transporations and the way in which the transporations support the other objectives of the plan. Development plans should provide the means for:  examining the relationship between transport and land use planning;  promoting the integration and coordination of transport and land use planning;	es the in all of is see is set by or ear ent si che ent ent ent ent ent ent ent ent ent en	

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	<ul> <li>promoting strategies to reduce the need to travel</li> <li>set out the land use/transportation strategy, addressing accessibility and the provision of strategic and integrated transport facilities, including roads, railways and interchanges;</li> <li>ensure that new housing, jobs, shopping, leisure and services are highly accessible by walking, cycling and public transport;</li> <li>locate major generators of travel demand within existing urban areas, or in other locations that can be well served by walking, cycling and public transport;</li> <li>encourage higher density and mixeduse development near public transport nodes, or near corridors well served by public transport;</li> <li>ensure that development sites which are highly accessible to non-car modes are used for travel intensive uses, reallocating their use if necessary;</li> <li>in rural areas, designate local service centres, or clusters of settlements where a sustainable functional linkage can be demonstrated, as the preferred locations for new development;</li> <li>include specific measures to promote active travel in accordance with the Active Travel (Wales) Act 2013;</li> <li>set out policies to promote the use of public transport including new and improved interchange facilities and,</li> </ul>		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	where appropriate, park and ride schemes;  include appropriate traffic management policies;  identify the primary road network, including trunk roads, and separately identify the core network;  identify proposals for new roads and major improvements to the primary route network and the broad policy on priorities for minor improvements;  include policies and proposals relating to the development of transport infrastructure other than roads;  identify, and where appropriate protect, routes required for the sustainable movement of freight;  protect disused transport infrastructure, including railways, rail sidings, ports, harbours and inland waterways from development that would compromise their future transport use, where re-use is a possibility; and  minimise the adverse impacts of transport infrastructure projects on the natural, historic and built environment and on local communities.  LDPs should maximise the use of existing infrastructure and should consider how the provision of different types of infrastructure can be co-ordinated.		
	LDPs should consider PPW (2016) 'Infrastructure and Services' objectives when considering the effects of development on the		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	management of waste, development plans and waste planning, development management and waste planning.  LDPs should set out policies and proposals for the location of telecommunications equipment, allocating sites for major developments and including criteria-based policies to guide telecommunications developments where sites other than those identified in the plan may be proposed.		
	Local planning authorities must develop a strategic and long-term approach to infrastructure provision when preparing development plans. They should consider both the siting requirements of the utility companies responsible for these services to enable them to meet community needs and the environmental effects of such additional uses. Development may need to be phased, in consultation with the relevant utilities providers, to allow time to ensure that the provision of utilities can be managed in a way consistent with general policies for sustainable development.		
	It is essential that local planning authorities consult utility companies and other infrastructure providers and Natural Resources Wales at an early stage in the formulation of land use policies. Welsh Government guidance in Local Development Plan Wales (2015) provides details of the bodies which must be consulted about		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	particular issues to ensure that plan policies are realistic and capable of implementation.		
Regional			
<ul> <li>Welsh Government - Turning Heads – A Strategy for the Heads of the Valleys 2020, 2006</li> <li>Welsh Government - City Regions Final Report July 2012</li> <li>South East Wales Regional Aggregates Working Party – Regional Technical Statement 2014</li> <li>Cardiff capital Region City Deal (2015) Powering the Welsh Economy</li> <li>South East Wales Valleys Local Transport Plan, January 2015</li> <li>Western Power Distribution – Innovation strategy 2017</li> <li>South East Wales Transport Alliance Regional Transport (March 2010)</li> </ul>			
Local (BGCBC & Neighbouring Local Authoriti international frameworks	es) - all legislative and policy frameworks are	e informed by relevant higher I	evel Welsh, UK, European and
<ul> <li>Blaenau Gwent Public Service Board Wellbeing Assessment (2017)</li> <li>Blaenau Gwent Public Service Board Well Being Plan for Torfaen 2018-2033</li> <li>South East Wales Valleys Local Transport Plan (February 2015)</li> <li>Blaenau Gwent Active Travel Plan</li> <li>Blaenau Gwent Draft Rights of Way Improvement Plan (2007-2017)</li> <li>Blaenau Gwent Corporate Plan 2018-2022</li> </ul>	The Blaenau Gwent Well-being Assessment summarises the challenges to economic, environmental and social well-being for residents in the Blaenau Gwent area in accordance with the Well-being of Future Generations (Wales Act 2015). Informed by the Well-being Assessment, the Well-being Plan (2018-2023) identifies measures to improve well-being, including:  • Promote active travel to reduce carbon footprint  • Promote healthy lifestyles like taking exercise  The South East Wales Valleys Local Transport Plan prepared for Blaenau Gwent, Caerphilly, Merthyr Tydfil, Rhondda Cynon Taf and Torfaen sets down the vision and objectives for transport in the SE Wales Valleys area and provides a short and long term programme of interventions to work towards achieving these goals. The short-term programme sets down those schemes that are priorities for the next 5 years up to 2020. The longer-term programme identifies aspirations up to 2030.  The vision, goals and objectives identified in the RTP were considered to be core to the direction of the LTP and were taken forward as the vision, goals and objectives of the SE Wales Valleys LTP.	policies, proposals and advice and guidance in relation to waste, recycling, safeguarding of minerals and promotion of a safe, efficient, accessible and sustainable transport system and provide opportunities for walking and cycling.	relating to the relative accessibility of proposed new developments and objectives to ensure that they are supported by sustainable transport measures. Objectives relating to waste, recycling and safeguarding

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	One of the priorities of the Blaenau Gwent Corporate Plan is strong and environmentally smart communities where the aim is to increase rates of recycling to achieve national targets and to improve access to and quality of open spaces.		
<ul> <li>Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012</li> <li>Brecon Beacons National Park Local Development Plan – adopted Dec 2013</li> <li>Torfaen County Borough Council Local Development Plan – adopted Dec 2013</li> <li>Powys County Council Local Development Plan –adopted April 2018</li> <li>Caerphilly County Borough Council Local Development Plan –adopted November 2010</li> </ul>	The LDPs set out the land-use planning framework for neighbouring local authorities.	that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that	The SA should seek to ensure that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency.
7. Human Health			
International			
the Child 1989  World Health Organisation (1999)  Guidelines for Community Noise (1999)  United Nations 2016 Committee on the Rights of Child recommendations Report  World Health Organisation (2004)  Children's Environment and Health Action Plan for Europe	These documents provide the international framework which recognises the importance of the preservation and protection of human health when undertaking development activities.	and proposals for the prevention of	
European – all legislative and policy frameworks are inform	ned by relevant higher level international frameworks		
<ul> <li>Noise Directive (Directive 2002/49/EC)         European Commission (2002)</li> <li>Environmental Noise Directive (END) 2002/49/EC</li> <li>European Commission (2007) Together for Health - A Strategic Approach for the EU 2008-2013</li> </ul>	These documents provide a European framework to reduce noise pollution and promote a strategic vision for improving health standards		The SA Framework should include objectives for acceptable noise and other safety levels for the protection of human health.
National (UK) - all legislative and policy frameworks are inf	ormed by relevant higher level European and internation	onal frameworks	
and Health Action Plan	These documents provide a framework at the UK level to reduce health inequalities and to improve public health while promoting active lifestyles		relating to tackling health issues and creating

	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
Protection Agency (2009) Health Strategy for the United Kingdom 2  Health and Safety Executive (2009) The Health and Safety of Great Britain: Be Part of the Solution,			
Sustainable Development Commission (2010)     Sustainable Development: The Key to Tackling Health     Inequalities			
<ul> <li>The Marmot Review</li> <li>The Health and Social Care Act (2012)</li> <li>Child Obesity Plan (2016)</li> </ul>			
National (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK, European and in	ternational frameworks	
Welsh Government (2006) Climbing Higher – A Strategy	These documents provide a framework at the Welsh level to improve the physical and mental health of the	The revised LDP should set out policies	
Welsh Government (2008) Designed to Add Value - a third dimension for One Wales		provisions.	communities regardless of location.
Welsh Government (2009) Rural Health Plan			
Wales Government (2010) Setting the Direction: Primary and Community Services Strategic Delivery programme			
<ul> <li>NHS Wales (2011) Together for Health</li> <li>Welsh Government (2012) Working Differently – Working Together</li> </ul>			
Welsh Government (2012) Together for Mental Health:     A Strategy for Mental Health and Wellbeing in Wales			
Welsh Government (2013) A Noise Action Plan for Wales 2013-2018			
National Assembly for Wales (2014) Social Services and Well Being (Wales) Act 2014  The Assembly for Wales (2015)  Act (2015)			
<ul> <li>The Active Travel (Wales) Act (2015)</li> <li>Public Health Wales (2015) A Healthier, Happier and Fairer Wales</li> </ul>			
National Assembly for Wales (2016) Public Health (Wales) Bill			
Children's Commissioners for Wales (2016) Annual Report 15-16			
Welsh Government / NHS (2016) Measuring the health and well-being of a nation: Public Health Outcomes Framework for Wales  Public Health (Wales) Act 2017			
Wales National Planning Policy			

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
Planning Policy Wales (Edition 9)	<ul> <li>These documents provide national planning policy in respect of health. PPW requires the planning system to:</li> <li>Contribute to the protection and, where possible, the improvement of people's health and wellbeing as a core component of achieving the well-being goals and responding to climate change.</li> <li>Consideration of the possible impacts of developments – positive and/or negative – on people's health at an early stage will help to clarify the relevance of health and the extent to which it needs to be taken into account</li> <li>Development plan policies should be designed to ensure, as far as is practicable, that noise-sensitive developments, such as hospitals, schools and housing, that need to be located close to the existing transportation infrastructure to facilitate access, are designed in such a way as to limit noise levels within and around those developments.</li> <li>Development plan policies and decisions on planning applications should take into account national air quality objectives, EU limit and target values.</li> <li>World Health Organisation guidelines on the health effects of noise and national indicators set by the Welsh Ministers under the Well-being of Future Generations (Wales) Act 2015, together with information from the local authority's annual air quality reports, national noise maps and any area statements issued by Natural Resources</li> </ul>	provide policies, proposals, advice and guidance relating to the promotion of health and wellbeing and to ensure developments are planned without adverse effects in terms of noise in line with relevant regulations.	objectives relating to all aspects of human health and wellbeing and to the mitigation of noise impacts to new development

Pla	ans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
		Wales under the Environment (Wales) Act 2016.		
Reg	jional			
•	Gwent Childhood Obesity Strategy (July 2015) Gwent Regional Partnership Board: Area Plan (April 2018) Aneurin Bevan University Health Board: Integrated Medium Term Plan (March 2018) Aneurin Bevan University Health Board: Clinical Futures strategy	These plans set out the range and level of services that are to be provided in response to population need. They include the details of specific services that are planned.	set out policies and proposals	The SA Framework should include objectives relating to adequate health provisions for all communities regardless of location.
Loc	al (BGCBC & Neighbouring Local Authorities) - all legis	slative and policy frameworks are informed by relevant	higher level Welsh, UK, European and	I international frameworks
•	Blaenau Gwent Public Service Board Well-being Assessment (2017) Blaenau Gwent Public Service Board Well Being Plan for Blaenau Gwent 2018-2033 Annual Report of the Director of Social Services for Blaenau Gwent 2016-2017 Blaenau Gwent Corporate Plan 2018-2022	The Blaenau Gwent Well-being Assessment (2017) summarises the challenges to economic, environmental and social well-being affecting residents of Blaenau Gwent as required under the Well-being of Future Generations (Wales) Act 2015. Informed by the Well-being Assessment, the Blaenau Gwent Public Service Board (2018-2023) sets key health objectives:  Encourage and enable People to make healthy lifestyles choices in the places they live, work and play  Promote healthy lifestyle behaviours Help people to reduce and avoid unhealthy harming behaviours  Remove the barriers that stop people making healthier choices One of the priorities of the Blaenau Gwent Corporate Plan is strong and environmentally smart communities where the aim is to improve access to and quality of open spaces.	provide land use policies and proposals which promote the good health of all of the County Borough's residents by providing new developments which foster the opportunity for healthier lifestyles and protecting the open space and countryside from unnecessary development.	The SA Framework should include objectives relating to tackling both health issues and their causes and consider the impact of new development on residents' health and well-being.
	Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012 Brecon Beacons National Park Local Development Plan – adopted Dec 2013 Torfaen County Borough Council Local Development Plan – adopted Dec 2013 Powys County Council Local Development Plan –adopted April 2018 Caerphilly County Borough Council Local Development Plan –adopted November 2010	The LDPs set out the land-use planning framework for neighbouring local authorities.	that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the	The SA should seek to ensure that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency. This includes potential

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
		1.	
8. Cultural Heritage			
International			
UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage United Nations (1979) Geneva Convention World Cities Culture Report 2015 – measures and cultural assets, UNESCO (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage	These documents provide an international framework to identify and protect cultural heritage assets. They aim to ensure the cultural heritage assets have a function in the community and are integrated into various planning programmes.	policies, proposals, advice and guidance for the protection,	
European – all legislative and policy frameworks are inform	ned by relevant higher level international frameworks		
European Convention on the Protection of Archaeological Heritage (1992)	This document provides a European framework for the protection of designated cultural and archaeological heritage sites in accordance with European legislation.		The SA Framework should include objectives relating to protection of heritage assets
National (UK) - all legislative and policy frameworks are inf	ormed by relevant higher level European and internation	onal frameworks	
<ul> <li>The Ancient Monuments and Archaeological Areas Act 1979</li> <li>HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979</li> <li>The Planning (Listed Buildings and Conservation Areas) Act 1990</li> <li>HM Government (1996) The Treasure Act 1996</li> <li>HM Government (2002) The National Heritage Act 2002</li> <li>Department for Culture, Media &amp; Sport (2007) Heritage Protection for the 21st Century</li> <li>Heritage Protection for the 21st Century: White Paper (DCMS, 2007),</li> <li>Department for Culture, Media &amp; Sport (2013) Scheduled Monuments &amp; Nationally Important but Non-Scheduled Monuments</li> </ul>	These documents provide a framework at the UK level regarding the protection and conservation of cultural and heritage assets, including listed buildings, ancient monuments and archaeological resources.	policies, proposals, advice and	relating to the protection, enhancement, conservation and preservation of heritage

	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
National (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK, European and in	ternational frameworks	
<ul> <li>Valuing the Welsh Historic Environment Welsh Government (2010)</li> <li>Welsh Language (Wales) Measure 2011, Cymraeg 2050 A million Welsh speakers</li> <li>Environment (Wales) Act 2016</li> <li>National Assembly for Wales (2016) Environment (Wales) Act 2016</li> <li>Welsh Government Historic Environment (Wales) Act 2016</li> <li>Light Springs through the Dark: A vision for culture in Wales (2016)</li> <li>Welsh Government (2010) Valuing the Welsh Historic Environment</li> </ul>	regarding the protection of cultural heritage, including		The SA Framework should include objectives relating to the protection of cultural heritage assets.
Wales National Planning Policy			
Policy Wales (Edition 9)  Welsh Government Technical Advice Note (TAN) 12: Design (2016)  Welsh Government Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017)  Technical Advice Note (TAN) 24: The Historic Environment (2017)	cultural heritage.	and proposals relating to the protection	The SA Framework should include objectives relating to the protection and enhancement of the historic environment and the promotion of the Welsh language.

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	Development plans should also set out proposals for re- use or new development affecting historic areas and buildings, which may assist in achieving the Welsh Government's objectives for urban and rural regeneration.		
	Development plans must only identify locally specific policies in relation to the historic environment. Locally specific policies for the historic environment must be distinctive and only cover those heritage elements deemed as important considerations from a local planning perspective during the determination of planning applications.		
	In preparing plans and assessing proposals for development, local planning authorities must keep under review their access to records of the historic environment in their area.		
	Historic environment records must be used as a key source of information for the formulation of development plans and advice on their use should be sought from the Welsh Archaeological Trusts.		
	When preparing a development plan, local planning authorities are required to undertake a Strategic Environmental Assessment and a Sustainability Appraisal. An assessment of the cultural heritage is one of the baseline studies in this process and requires consultation with Cadw.		
	Development plans must reflect that World Heritage Sites have been inscribed by UNESCO because of their Outstanding Universal Value. These sites can also contribute to a national and local sense of community and to sustainable economic development and regeneration. They can cover more than one authority's jurisdiction and there is a need to ensure there are consistent planning policies in the relevant development plans.		
	Provide policies and or guidance relating to the protection and preservation of world heritage sites, archaeological sites, listed buildings and conservation areas, local historic assets and historic parks and gardens		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	The Planning (Wales) Act 2015 contains provisions relating to the consideration of the Welsh language in the appraisal of development plans and in dealing with applications for planning permission.		
	Local planning authorities must consider the likely effects of their development plans on the use of the Welsh language in the Sustainability Appraisal of their plans, and should keep their evidence up to date. All local planning authorities should include in the reasoned justifications to their development plans a statement on how they have taken the needs and interests of the Welsh language into account in plan preparation, and how any policies relating to the Welsh language interact with other plan policies The sustainability appraisal is required to include an assessment of the likely effects of the plan on the use of the Welsh language in the area of the authority developments.		
Regional			
• N/A			
Local (BGCBC & Neighbouring Local Authorities) - all legis	 slative and policy frameworks are informed by relevant	higher level Welsh, UK, European and	international frameworks
<ul> <li>Blaenau Gwent County Borough Council Welsh Language Promotion Strategy (2017-2022)</li> <li>Blaenau Gwent Annual Welsh Language Monitoring Report 2015/16, 2016/17 and 2017/18</li> <li>Blaenau Gwent Public Services Board Well-Being Plan (2018-2023)</li> <li>Blaenau Gwent Public Services Board Well-being Assessment April 2017</li> </ul>		The revised LDP should provide policies and proposals relating to the preservation and promotion of the welsh language and promote the economic, environmental and social well-being in Blaenau Gwent.	The SA Framework should include objectives relating to the
Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012	The LDPs set out the land-use planning framework for neighbouring local authorities.		The SA should seek to ensure that all significant cross boundary issues

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
<ul> <li>Brecon Beacons National Park Local Development Plan – adopted Dec 2013</li> <li>Torfaen County Borough Council Local Development Plan - adopted Dec 2013</li> <li>Powys County Council Local Development Plan –adopted April 2018</li> <li>Caerphilly County Borough Council Local Development Plan –adopted November 2010</li> </ul>		and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency. This includes potential enhancements to those designated and non-	are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency. This includes potential enhancements to those designated and non-designated natural environment sites (landscape, biodiversity and heritage) and other networks that cross LA boundaries.
9. Landscape			
International			
European Landscape Convention (The Florence Convention 2000)	This document provides a European framework to define and protect important landscapes which contribute to cultural and social heritage and quality of life.	policies and proposals for the	objectives relating to landscape features, landscape character and visual impacts.
European – all legislative and policy frameworks are inform			
<ul> <li>UNESCO (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage,</li> <li>Council of Europe (2000) European Landscape Convention</li> <li>UNESCO (2001) Convention on the Protection of Underwater Cultural Heritage</li> <li>World Cities Culture Report 2015 – measures and cultural assets</li> </ul>	identify and protect cultural heritage assets. They aim to ensure the cultural heritage assets have a function in the community and are integrated into various planning	policies, proposals, and guidance for the protection, preservation and	relating to protection of heritage assets and
National (UK) - all legislative and policy frameworks are in	ormed by relevant higher level European and internation	onal frameworks	

F	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	HM Government (1949) National Parks and Access to the Countryside Act 1949 HM Government (1967) Forestry Act 1967 Hedgerow Regulations 1997 HM Government (2000) Countryside and Rights of Way Act 2000 HM Government (2006) Commons Act 2006 Natural Environment and Rural Communities Act (2006) HM Government (2006) Commons Act 2006	These documents provide a framework at the UK level regarding the protection of national parks, countryside and rural communities including rights of way and protection of forests.	The revised LDP should set out policies and proposals for the protection of landscapes and hedgerows; including protected areas within the County Borough.	The SA Framework should include objectives relating to landscape features, landscape character and visual impacts
N	ational (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK, European and in	ternational frameworks	
•	Countryside Council for Wales (now Natural Resources Wales) (2001) Register of Landscapes of Historic Interest, Natural Resources Wales (ongoing) LANDMAP Programme Environment (Wales) Act 2016		policies and proposals for the	relating to landscape features, landscape
٧	lales National Planning Policy			
•	Welsh Government Planning Policy Wales (2016) (Edition 9) Technical Advice Note (TAN) 7 Outdoor Advertisement Control	<ul> <li>These documents provide national planning policy in respect of landscape. They require:         <ul> <li>Development Plans to set out the locational policy framework for the conservation and enhancement of the natural heritage within the context of an integrated strategy for social, economic and environmental development in line with sustainability principles.</li> <li>Plans should seek to conserve and enhance the natural heritage in ways which bring benefits to local communities and encourage social and economic progress.</li> <li>Development Plans to be informed by a sustainability appraisal commencing at the outset of the plan.</li> </ul> </li> <li>LDP's should:</li> </ul>	policies and proposals and guidance relating to the protection and enhancement of designated landscapes, local landscape character, landscape features and visual	objectives relating to the protection and enhancement of designated landscapes, landscape character, landscape features and visual
		<ul> <li>identify all international, national and local designated sites (including potential SPAs, candidate SACs and listed Ramsar sites);</li> </ul>		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	<ul> <li>provide criteria against which a development affecting the different types of designated site will be assessed, reflecting their relative significance;</li> <li>include locally-specific policies for the conservation and, where appropriate, enhancement of landscape and amenity;</li> <li>provide for the conservation and, where appropriate, enhancement of biodiversity and landscape outside designated areas, in particular identifying opportunities to conserve important local habitats and species, and to safeguard and manage landscape features of major importance for nature conservation or amenity;</li> <li>make appropriate provision for Local Nature Reserves;</li> <li>include, where appropriate, locally-specific policies for conserving native woodland and protecting and planting trees;</li> <li>clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate;</li> <li>provide for the protection and enhancement of open space of conservation value, seeking to identify opportunities to promote responsible public access for enjoyment and understanding of the natural heritage where this is compatible with its conservation and existing land uses; and</li> <li>recognise the potential of, and encourage land uses and land management practices</li> </ul>		
	that help to secure carbon sinks.		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
Regional			
• N/A			
Local (BGCBC & Neighbouring Local Authorities international frameworks			evel Welsh, UK, European and
<ul> <li>Blaenau Gwent Public Service Board Well-being Assessment (2017)</li> <li>Blaenau Gwent Public Service Board Well Being Plan for Blaenau Gwent 2018-2033</li> </ul>	summarises the challenges to economic, environmental	provide policies and proposals for the preservation of protected landscapes and natural resources within the BGCBC planning area.	The SA framework should include objectives relating to landscape features, landscape character and visual impacts.
Blaenau Gwent County Borough Council Local Development Plan – adopted Nov 2012     Brecon Beacons National Park Local Development Plan – adopted Dec 2013     Torfaen County Borough Council Local Development Plan – adopted Dec 2013     Powys County Council Local Development Plan –adopted April 2018     Caerphilly County Borough Council Local Development Plan –adopted November 2010	neighbouring local authorities.	that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the requirement for development plan compatibility and consistency. This includes potential enhancements to those designated and non-	ŭ

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
10. Climatic Factors			
International			
<ul> <li>United Nations (1994), The United Nations Framework Convention on Climate Change</li> <li>United Nations (1997) Kyoto Protocol to the UN Convention on Climate Change</li> <li>United Nations (2009) The Copenhagen Accord</li> <li>United Nations (2010) Cancun Adaptation Framework, United Nations (2016) Paris Agreement</li> </ul>	identifying the need for climate change mitigation and	and proposals, that promote the	The SA Framework should include objectives to adapt to the effects of climate change promote energy efficiency, resource efficiency, sustainable transport, greenhouse gas emissions (GHG) and climate change mitigation.
European – all legislative and policy frameworks are inforn	ned by relevant higher level international frameworks		
Directive 2001/81/EC  European Commission (2002) Energy Performance in Buildings Directive 2002/49/EC  European Union (2005) Emissions Trading Scheme (EU ETS)  European Commission (2007)The Integrated Climate and Energy Package	These documents provide a European framework to respond to the global challenge of climate change. They promote and seek to secure the minimisation of future climate change through mitigation and the implementation of adaptation measures to the future effects of climate change.  In respect of the UK a key aim is that we are required to ensure 15% of energy needs are delivered from renewable sources, including biomass, hydro, wind and solar power by 2020.	that adapt to the effects of climate	The SA Framework should include objectives for increasing use of low carbon and renewable energy sources, resource efficiency, sustainable development that reduces the need to travel and to ensure new development is designed to adapt to the future effects of climate change.
National (UK) - all legislative and policy frameworks are inf	formed by relevant higher level European and internation	onal frameworks	
HM Government (2006) The Stern Review: The Economics of Climate Change	These documents provide a framework at the UK level regarding the need to mitigate and adapt to climate		The SA Framework should include objectives for increasing use of low carbon and

P	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	Carbon Economy - the UK's Contribution to Tackling Climate HM Government (2008) Climate Change Act 2008 HM Government (2008) The Energy Act 2008 Health Protection Agency (2008) Health Effects of Climate Change in the UK 2008 - An update of the Department of Health report 2001/2002 DECC (2009) UK Ports for the Offshore Wind Industry: Time to Act DECC (2009) Framework for the Development of Clean Coal HM Government (2009) The Climate Change Act 2008 (2020 Target, Credit Limit and Definitions) Order 2009 Environment Agency (2010) Managing the Environment in a Changing Climate DECC (2011) The Carbon Plan Carbon Plan: Delivering our Low Carbon Future DECC (2011) National Policy Statements for Energy	•	environmental effects from new development and to promote use of	renewable energy sources, resource efficiency, sustainable development that reduces the need to travel and to ensure new development is designed to adapt to the future effects of climate change.
•	Infrastructure DECC (2011) UK Renewable Energy Roadmap Defra (2012) UK Climate Change Risk Assessment:			
•	Government Report			
•	Defra (2013) The National Adaptation Programme: Making the Country Resilient to a Changing Climate			
•	DECC (2014) UK National Energy Efficiency Action Plan HM Government (2015) Ozone-Depleting Substances Regulations 2015			
•	HM Government (2017) UK Climate Change Risk Assessment			
Na	ational (Wales) - all legislative and policy frameworks are	informed by relevant higher level UK, European and in	ternational frameworks	
•	Welsh Government (2006) Environment Strategy for	These documents provide a framework at the		The SA Framework should include objectives
•	Wales Sustainable Development Commission (2009) Low Carbon Wales		energy and energy usage in new development, utilisation of renewable	relating to renewable energy use, resource efficiency, sustainable transport, GHG emissions and climate change mitigation.
•	Welsh Government (2010) Climate Change Strategy for Wales Welsh Government (2010) Low Carbon Revolution – the	framework focuses on seeking to decarbonise key economic sectors, encouraging	and low carbon energy sources, and promotion of sustainable design. Also to minimise environmental effects from	
	Welsh Government Energy Policy Statement	renewable and low carbon energy generation	new development and to promote use of renewable and low carbon	

I	Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
•	<ul> <li>Welsh Assembly Government (2010), Capturing the Potential: A Green Jobs Strategy for Wales,</li> <li>Welsh Government (2011) Marine Renewable Energy Strategic Framework</li> <li>Welsh Government (2011) Policy Statement: Preparing for a Changing Climate</li> <li>Welsh Assembly Government (2011) Preparing Wales for Climate Change: Adaptation Delivery Plan,</li> <li>Welsh Government (2012) Energy Wales: A Low Carbon Transition</li> <li>Welsh Assembly Government (2016) Environment (Wales) Act 2016</li> <li>Committee on Climate Change (2017) UK Climate Change Risk Assessment 2017 Evidence Report, Summary for Wales</li> </ul>	environment.	technologies and minimising emissions of Greenhouse Gases.	
1	Wales National Planning Policy			
•	<ul> <li>Welsh Government Planning Policy Wales (2016) (Edition 9),</li> <li>Welsh Government (2005) Technical Advice Note (TAN) 8: Renewable Energy</li> </ul>	planning policy on mitigating and adapting the		The SA Framework should include objectives relating to climate change mitigation and adaptation.

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	Local planning authorities are encouraged to work collaboratively in order to gather evidence on a sub-regional basis wherever possible  The Welsh Government's objectives in relation to infrastructure and climate change to promote the generation and use of energy from renewable and low carbon energy sources at all scales and promote energy efficiency, especially as a means to secure zero or low carbon developments and to tackle the causes of climate change.		
Regional			
• N/A			
Local (BGCBC & Neighbouring Local Authoritic international frameworks	es) - all legislative and policy frameworks are	e informed by relevant higher l	evel Welsh, UK, European and
<ul> <li>Renewable Energy Assessment (March 2011)</li> <li>Blaenau Gwent Public Service Board Well-being Assessment (2017)</li> <li>Blaenau Gwent Public Service Board Well Being Plan for Blaenau Gwent 2018-2033</li> <li>Blaenau Gwent Flood Risk Management Strategy</li> <li>Blaenau Gwent Flood Risk Management Plan</li> <li>Blaenau Gwent Corporate Plan 2018-2022</li> </ul>	The Welsh Government has set a challenging 40% reduction in CO <sub>2</sub> emissions across all sectors, as set out in A Climate Change Strategy for Wales 2011. A Renewable Energy Assessment has been prepared to assess the potential of the Blaenau Gwent area to contribute to national greenhouse gas emission reduction targets.  The Blaenau Gwent Well-being Assessment (2017) summarises the challenges to economic, environmental and social well-being affecting residents of Blaenau Gwent as required under the Well-being of Future Generations (Wales) Act 2015. Informed by the Wellbeing Assessment, the Blaenau Gwent Public Service Board (2018-2023) sets key environmental objectives: Blaenau Gwent wants to look after and protect its environment	provide policies, proposals and guidance to protect communities against flood risk and to support the movement to a lower carbon economy. This	objectives relating to energy use and energy efficiency, emissions and climate change mitigation. It should also include objectives which mitigate against flood risk.

P	lans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
		Lead on action against climate change through delivery of a carbon positive project		
11	. Interrelated Effects			
In	ternational			
•	United Nations (1992) The Rio Declaration on Environment and Development, United Nations (2002) The World Summit on Sustainable Development Johannesburg Declaration on Sustainable Development, Communication COM (2005) 666: Taking Sustainable use of resources forward	Commits the sustainable use of resources and promotes sustainable development.		The SA Framework should include guidance for achieving sustainable development goals.
Ει	uropean – all legislative and policy frameworks are inforn	ned by relevant higher level international frameworks		
•	Development Perspective (ESDP) (97/150/EC EU Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment) EU Environmental Action Programme: Living Well, Within the Limits of Our Planet European Sustainable Development Strategy 2001 (Renewed 2006, Reviewed 2009) European Commission (2009) Review of the EU Sustainable Development Strategy European Commission European Union (2001) SEA Directive (2001/42/EC), European Union (2014) Environmental Impact Assessment Directive 2014/52/EU amending Directive 2011/92/EU	These documents provide an overarching European framework to support the delivery of sustainable development, including through spatial planning systems.	The revised LDP should set out policies and proposals for the promotion of sustainable development goals as set out by International Legislation and policy.	The SA Framework should include objectives relating to sustainable development targets.
Na	ational (UK) - all legislative and policy frameworks are inf			
•	HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act 1990 HM Government (2000) Transport Act 2000 The UK Sustainable Development Strategy (HM Government, 2005) Sustainable Development Commission (2005) One Future – Different Paths. Shared Framework for Sustainable Development HM Government (2006) Government of Wales Act 2006	These documents provide a framework at the UK level to promote sustainable development and sustainable transport initiatives.		The SA Framework should include objectives relating to sustainable development targets.

Plans/Programme:	s	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
Transport (2008) Deliving System  National Planning Policipal Planning Practice Guidant Planning Practice Planning Planning Planning Planning Planning Planning Planet  Welsh Assembly Govern Planet  Welsh Government (2011) Wales (2014-2020)  Welsh Assembly Govern Report  Planning (Wales) Act 2011  Welsh Government (2011) Prosperity for all: the Nigovernment, Taking Wales  Environment (Wales) Act  Welsh Government:  Conversation, Reforming Renewed — Welsh Ass (Jan 2017)  Welsh Government Valles Future (July 2017)	The Wales Act litute (2017) Digital Economy and litute (2017) Digital Economy and litute (2017) Digital Economy and litute (2008) People, Places, ial Plan literature (2009) One Wales: One 1) Rural Development Plan for literature (2012) City Regions Final 5  6) Welsh Assembly Government lational Strategy Programme for literature (2016) Programme for literature (2016) Programme for literature (2016) Programme (2016) Wales We Want National Local Government: Resilient and lembly Government Whitepaper literature (2016) Programme (20	These documents provide a Welsh framework for sustainable urban and rural development, city regional development and spatial planning. The Valleys Task force document is a high level action plan for the South Wales Valleys which outlines its priorities for the future. The document identifies Ebbw Vale as a strategic hub which will inform the LDP Strategy for the area.	The revised LDP should provide policies and proposals for adhering to sustainable development, and	The SA Framework should include objectives relating to sustainable development targets and promotion of regeneration.
Wales National Planni	ng Policy			
Welsh Government (2016) (Edition 9)	Planning Policy Wales	The Planning (Wales) Act 2015 introduced a statutory purpose for the planning system in Wales – any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as set out in the Well-being of Future Generations (Wales) Act 2015. The planning system is therefore necessary and central to achieving the sustainable development of Wales.		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	Development plans need to provide a framework to stimulate, guide and manage change towards sustainability. They should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities. In their land allocation policies and proposals, local planning authorities should:		
	Promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good;		
	<ul> <li>maintain and improve the vitality, attractiveness and viability of town, district, local and village centres;</li> <li>foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings;</li> </ul>		
	<ul> <li>locate development so that it can be well serviced by existing infrastructure (including for energy supply, waste management and water);</li> <li>ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location;</li> </ul>		
	<ul> <li>locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, ensure that the development is designed for resilience over its whole lifetime;</li> </ul>		
	<ul> <li>ensure that tackling the causes and consequences of climate change is taken into account in locating new development.</li> </ul>		
	Local planning authorities should consider the contribution that their settlement strategies can make to tackling the causes of climate change and the need to deal with the consequences of climate change.		

Plans/Programmes	Overview of Purpose and Key Requirements	Key Implications for LDP	Key Implications for SA
	Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car.		
	Development plans should encourage a mix of uses in town centres and other appropriate places to add activity and choice of places in which to live.		
	Local planning authorities need to consider establishing Green Belts and making local designations, such as green wedges. Both Green Belts and green wedges must be soundly based on a formal assessment of their		
	contribution to urban form and the location of new development and can take on a variety of spatial forms.		
Regional			
Cardiff Capital Region City Deal (2017), Emerging Cardiff City Region (South East Wales) Strategic Development Plan	The Cardiff City Region City Deal is a 20 year / £1.28 billion investment programme which aims to achieve a 5% uplift in the Region's GVA by delivering a range of programmes which will increase connectivity, improve physical and digital infrastructure, as well as regional business governance. Over its lifetime, local partners expect the City Deal to deliver up to 25,000 new jobs and leverage an additional £4 billion of private sector investment by 2036. It has 6 Objectives:-1. Connecting the Cardiff Capital Region; 2. Investing in innovation and the digital network; 3. Developing a skilled workforce and tackling unemployment; 4. Supporting enterprise and business growth; 5. Housing development and regeneration; and	need to be informed by the emerging City Deal and aligned with the preparation of a future emerging Cardiff City Region SDP to ensure that once adopted, both documents provide a coherent framework for effectively and	undertaken for the emerging Cardiff City Region SDP.  The SA Framework proposed for use in the SA of the LDP Review should be kept under

Plans/Programmes		Key Implications for LDP	Key Implications for SA
	6. Developing greater city-region governance across the Cardiff Capital Region.		
	The Cardiff Capital Region is considering the need to prepare a SDP for the Cardiff Capital Region.		
Local (BGCBC & Neighbouring Local Authorities international frameworks	es) - all legislative and policy frameworks are	e informed by relevant higher l	evel Welsh, UK, European and
<ul> <li>Blaenau Gwent Public Service Board Wellbeing Assessment (2017)</li> <li>Blaenau Gwent Public Service Board Well Being Plan 2018-2033</li> </ul>	These documents provide an assessment of social, economic, environmental, and cultural well-being for the area of Blaenau Gwent and its communities, as well as looking at the state of well-being of the people in the area. They identify the socio-economic and wellbeing challenges affecting residents within Blaenau Gwent and identify well-being objectives and associated measures to address these. The aim of assessment and well-being plan is to improve the well-being and future sustainability of communities across Blaenau Gwent.	locally identified well-being objectives and demonstrate compliance with the Wellbeing of Future Generations (Wales) Act 2015.	objectives relating to all aspects of health and well-being, including each of the well-being objectives

# **Baseline Information**

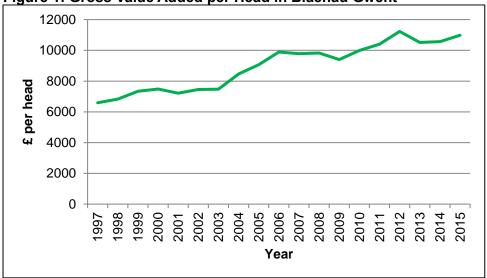
# 1.0 A Prosperous Wales

# **Population - Employment & Economy**

### GVA per head

There has been no change in position for Blaenau Gwent in terms of GVA per head. In 2003 and 2015 Blaenau Gwent had the lowest GVA per head of all local authorities in Wales. In 2015, the GVA per head in Blaenau Gwent was £10,980 per head, which is less than the GVA per head in 2012. In 2012, the GVA per head was £11,230, the highest since 1997. This could be attributed to the development of the former steelworks site in Ebbw Vale at this time.

Figure 1: Gross Value Added per Head in Blaenau Gwent



Source: ONS – Gross Value Added per head (income approach by Local Authority)

Enterprise Births and Deaths

Figure 2: Enterprise Births and Deaths in Blaenau Gwent

Year	2010	2011	2012	2013	2014	2015	2016
Births	95	140	125	190	170	190	180
Deaths	150	115	135	110	150	130	145
+/-	-55	+25	-10	+80	+20	+60	+35

Source: Office for National Statistics

Business births have been above business deaths in Blaenau Gwent since 2013, however since 2014 business deaths have increased.

#### Working Age Population

Blaenau Gwent has a higher percentage of its population at working age (16-64) than Wales as a whole, although the difference is marginal at 1.3%.

Figure 3: Working Age Population (aged 16-64) (2017)

	Blaenau Gwent (Numbers)	Blaenau Gwent %	Wales %
All people – working age	43,700	62.8	61.5
Males – working age	21,700	63.3	62.2
Females – working age	22,000	62.3	60.9

Source: ONS Population Estimates – local authority based by five year age band % is a proportion of total population

Economic Activity

Figure 4: Economically Active (Apr 2017-Mar 2018)

	Economically active (1)	In employment (1)	Employees (1)	Self employed (1)	Model based unemployed (2)
Blaenau Gwent	71.7%	67.1%	58.1%	8.3%	6.0%
Caerphilly	75.2%	70.2%	63.1%	6.3%	5.8%
Torfaen	79.0%	75.6%	67.5%	7.5%	4.9%
Monmouthshire	81.0%	78.0%	62.4%	14.7%	3.5%
Newport	78.0%	74.2%	67.6%	6.1%	5.4%
Wales	76.5%	72.7%	62.5%	9.7%	4.9%

Source: Nomis

- (1) % are for those of working age (16-64)
- (2) % is proportion of economically active

Blaenau Gwent has the lowest percentage of working age population economically active than all of the surrounding authorities and compared to Wales as a whole. Blaenau Gwent also has the largest percentage of the working age population who are economically inactive and not wanting a job than all surrounding authorities and Wales as a whole.

Figure 5: Economic Inactivity (Apr 2017-Mar 2018)

	Economically Inactive	Wanting a job	Not wanting a job
Blaenau Gwent	28.3%	22.1%	77.9%
Caerphilly	24.8%	28.9%	71.1%
Torfaen	21%	25.7%	74.3%
Monmouthshire	19%	24.5%	75.5%
Newport	22.0%%	35.35%	64.7%
Wales	23.5%	24.3%	75.7%

Source: Nomis

% is a proportion of those economically inactive

Figure 6 below shows the employment rate by age group in Blaenau Gwent compared to Wales. In Blaenau Gwent the employment rate ranges for working age from 31.7% in the 16-19 age group to 76.8% in the 25-35 age group. The lower employment rates for 16-19 and 20-24 year olds can be explained in part by the number of students while the lowest rates for 65 and over are due to retirement.

The general profile is similar at an all Wales level. However, the employment rate for Wales is higher than Blaenau Gwent for each age group, and also continues to rise to an older age group than in Blaenau Gwent, peaking at 83.1% for 35-49 year olds.

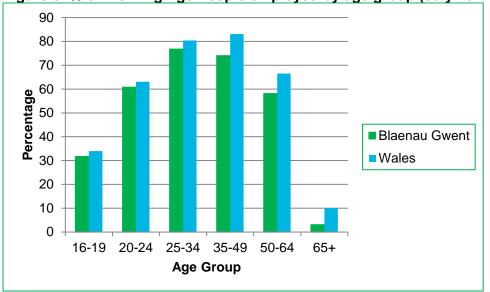


Figure 6: % of Working Age People employed by age group (July 15 – June 16)

Source: Office for National Statistics

Figure 7: Unemployment Rate by Age Group and Local Authority (March 2018)

<b>Local Authority</b>		Age Group							
	16+ (%)								
Blaenau Gwent	6.1	6.4	28.3	16.5	5.2	2.8	4.9	!	
(Wales)	4.9	5.0	22.4	9.5	5.3	2.5	3.0	2.4	

Source: Annual Population Survey ONS

The unemployment rate in Blaenau Gwent ranges between 28.3% for 16-19 year olds and 4.9% for 50-64 year olds. For Wales this is 22.4% and 3.0% respectively. Other than for 25-34 year olds the unemployment rate is higher in Blaenau Gwent for all other age groups.

There is a difference in unemployment rate in the 20-24 year age group, 16.5% in Blaenau Gwent compared to 9.5% in Wales. There is also a difference between the unemployment rate in the 16-19 age group, 28.3% in Blaenau Gwent compared to 22.4% in Wales. This is an improved picture from 2015-16 where the Blaenau Gwent Well-being Assessment identified that there was a significant difference in the unemployment rate in the 20-24 year age group, 22.8% in Blaenau Gwent compared to 9.7% in Wales.

Benefit Dependence

Figure 8: Working age key benefit claimants (November 2016)

	Blaenau Gwent	Caerphilly	Torfaen	Monmouthshire	Newport	Wales
Total	20.35%	17.4%	16.5%	10.0%	15.7%	14.4%
Job seekers	2.3%	1.8%	1.1%	0.8%	2.0%	1.4%
Incapacity benefits	12.0%	10%	9.8%	5.9%	8.5%	8.4%
Lone parents	1.6%	1.3%	1.3%	0.6%	1.5%	1.2%

Carers	2.9%	2.8%	2.5%	1.5%	2.3%	2.2%
Other on income related benefits	0.3%	0.2%	0.3%	0.1%	0.2%	0.2%
Disabled	1.1%	1.1%	1.2%	0.8%	0.9%	0.7%
Bereaved	0.2%	0.2%	0.2%	0.2%	0.2%	0.2%

Source: Nomis

% is a proportion of resident population

When compared to other surrounding authorities, in 2016, Blaenau Gwent has the largest percentage (20.35%) of its working age population claiming key benefits, in fact over 1/5 of the working age population.

The percentage of working age people claiming Job Seekers' Allowance in Blaenau Gwent was 2.3% in November 2016 which has significantly decreased since 2009 when the percentage was above 7% (Source: Blaenau Gwent Well-being Assessment). The percentage for Wales has also decreased. The gap between Wales and Blaenau Gwent has narrowed with a 1.1% difference in 2016 rather than a 3.2% difference in 2009.

### Long term Sickness

Figure 9 below shows that 42.4% of those who are economically inactive in December 2015 were long term sick. This compares to 28.5% for Wales for the same period.

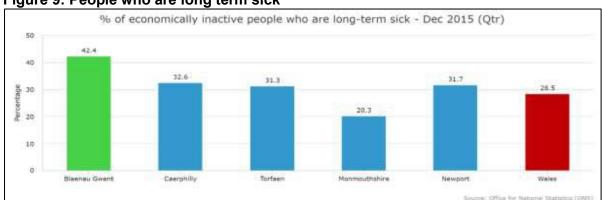


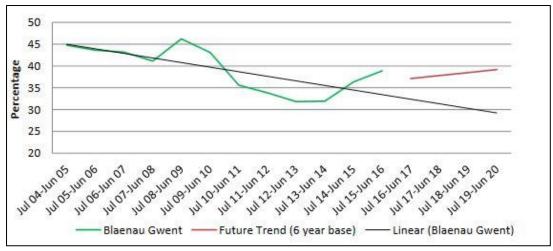
Figure 9: People who are long term sick

Source: Office for National Statistics

Figure 10 below shows that the 5 year fall in long term sickness in Blaenau Gwent during 2008 to 2014, from 46.2% to 31.9% was followed by a 2 year increase, rising to 38.9% in 2016. Although an increase was also seen at a Wales level over the same period, Blaenau Gwent still has 10.4% more long term sickness of its economically inactive population than the Wales level in 2016.

In terms of long term sick overall a downward trend has been seen over the last 12 years. Therefore, a future projection of this shows a general decrease in the rate of long term sickness over the next 4 years. However, where the future projection is based on the latest 6 years, the next 4 years shows a general increase in the rate of long term sickness.

Figure 10: People who are long term sick by time



Source: Office for National Statistics

Employment by Sector

Figure 11: % Employment by Standard Occupation Classification (April 2017-March 2018)

	Blaenau Gwent Numbers	Blaenau Gwent (%)	Wales (%)
Soc 2010 Major Group 1-3 1. Mangers, Directors and Senior Officials 2. Professional Occupations 3. Associate Professional & Technical	10,200	33.9%	40.6%
	3,100	10.3%	9.3%
	3,900	12.7%	18.0%
	3,200	10.5%	13.1%
Soc 2010 Major Group 4-5 4. Administrative & Secretarial 5. Skilled Trades Occupations	5,700	19.1%	22.4%
	2,500	8.1%	10.5%
	3,300	10.8%	11.8%
Soc 2010 Major Group 6-7 6. Caring, Leisure and Other Service Occs 7. Sales and Customer Service Occs	6,000	19.8%	18.2%
	4,100	13.6%	9.8%
	1,800	6.1%	8.3%
Soc 2010 Major Group 8-9 8. Process Plant & Machine Operatives 9. Elementary Occupations	8,200	27.2%	18.9%
	4,600	15.1%	7.4%
	3,600	11.8%	11.3%

Source: Nomis

% is a proportion of all persons in employment

Blaenau Gwent has a lower percentage (33.9%) of its working population in the standard occupation classifications 1 to 3, i.e. managers, professional occupations and associate professional and technical, than Wales (40.6%). In contrast, Blaenau Gwent has the highest percentage (27.2%) of its working age population in the standard occupation classification group 8-9 (process plant and machine operatives and elementary occupations) compared to Wales as a whole at 18.9%.

Employee Jobs in Blaenau Gwent

Figure 12: Employee Jobs (2016)

Figure 12: Employee Jobs (2016)	L.		
	Blaenau Gwent (Employee Jobs)	Blaenau Gwent %	Wales %
Total Employee Jobs	18,000		
Full time	12,000	66.7	65.2
Part time	6,000	33.3	34.8
Employee Jobs by Industry			
B : Mining and quarrying	50	0.3	0.2
C : Manufacturing	4,000	22.2	11.4
D : Electricity, gas, steam and air conditioning supply	0	0	0.6
E : Water supply; sewerage, waste management and remediation activities	350	1.9	0.9
F : Construction	900	5.0	5.5
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	3,000	16.7	15.1
H : Transportation and storage	400	2.2	2.9
I : Accommodation and food service activities	1,250	6.9	8.9
J : Information and communication	75	0.4	2.3
K : Financial and insurance activities	200	1.1	2.3
L : Real estate activities	400	2.2	1.6
M : Professional, scientific and technical activities	350	1.9	4.2
N : Administrative and support service activities	700	3.9	6.6
O : Public administration and defence; compulsory social security	1,000	5.6	8.6
P : Education	1,750	9.7	10.1
Q : Human health and social work activities	3,000	16.7	16.1
R : Arts, entertainment and recreation	500	2.8	2.5
S : Other service activities	250	1.4	1.5

Source: Nomis

In comparison to Wales, Blaenau Gwent has a marginally lower proportion of employee jobs accounted for by part-time employment. The largest employment sector in Blaenau Gwent is manufacturing (C) accounting for 22.2% of all employment whereas in Wales it is 11.4%. This is followed by Wholesale and retail trade; repair of motor vehicles and motorcycles (G) and human health and social work activities (Q) both with 16.7% compared to 15.1% and 16.1% for Wales respectively. This may be the reason for the lower income rates. The lack of opportunities may lead to out migration and commuting elsewhere to work, particularly for those residents educated to degree level or higher.

## Self Employed

The percentage of working age people self-employed in June 2016 was 6.1% (2,800) in Blaenau Gwent. This compares to 9.3% for Wales for the same period. Over the period June 2013 to June 2016 the percentage of self-employed increased by 2.3% of working age. This compares to an increase of 0.4% in Wales (Source: Blaenau Gwent Well-being Assessment).

# Earnings by Residence

# Figure 13: Gross Weekly Pay for Full-Time Workers

Year	Blaenau Gwent (£'s)	Caerphilly (£'s)	Monmouthshire (£'s)	Newport (£'s)	Torfaen (£'s)	Wales (£'s)
2009	361.00	414.0	512.8	443.7	430.0	444.90
2013	404.50	468.2	579.5	469.6	446.4	476.90
2014	395.90	473.1	582.1	469.6	468.9	480.00
2015	403.50	478.7	610.5	463.2	485.6	487.60
2016	433.90	484.7	619.4	471.2	491.0	498.30
2017	491.30	488.8	619.6	486.0	519.3	505.90
Difference (£'s) between 2009 and 2017	+130.3	+74.8	+106.8	+42.3	+89.3	+61

Source: Nomis

In 2017, the average gross weekly pay for full-time workers living in Blaenau Gwent was £491.30 compared to £361.00 in 2009 and £505.90 in Wales for 2017. Although the average gross weekly pay is less in Blaenau Gwent when compared to Wales in 2017, it is higher than Newport and Caerphilly.

The difference in the average gross weekly pay between 2009 and 2017 shows that when comparing Blaenau Gwent to the surrounding authorities and Wales, Blaenau Gwent has seen the greatest increase in gross average weekly pay since 2009 although it remains below the Welsh average.

Figure 14: Hourly-Pay Excluding Overtime

Year	Blaenau Gwent (£'s)	Caerphilly (£'s)	Monmouthshire (£'s)	Newport (£'s)	Torfaen (£'s)	Wales (£'s)
2013	10.13	11.45	14.89	11.87	11.26	12.00
2014	10.09	12.04	14.90	11.35	11.53	12.01
2015	10.55	12.35	16.46	11.79	12.20	12.30
2016	11.09	12.29	16.36	12.06	12.36	12.66
2017	12.00	12.69	16.34	12.13	13.12	12.75
Difference (£'s) between 2013 and 2017	+1.87	+1.24	+1.45	+0.26	+1.86	+0.75

Source: Nomis

In 2017, the hourly pay excluding overtime in Blaenau Gwent was £12.00 which is the lowest of all surrounding authorities and Wales. However there is a significant difference between the hourly pay in 2013 to 2017 in Blaenau Gwent, an increase of £1.87. In fact when compared to surrounding authorities and Wales, Blaenau Gwent has witnessed the biggest increase.

# Commuting

Figure 15: Summary Commuting Statistics 2017

Area of	% residents	% residents	Commuting		
residence	working in Wales	working in area of residence	Out of authority (thousands)	Into the authority (thousands)	Net inflow
Blaenau Gwent	89	49	15.5	5.5	-10
Torfaen	94	54	20.1	13.9	-6.2
Monmouthshire	82	58	18.6	17.1	-1.5
Newport	87	66	24.1	35.3	-11.2
Wales	96	69	94.3	41.9	52.4

Source: Stats Wales

89% of Blaenau Gwent residents work in Wales which is below the welsh average of 96% although higher than Monmouthshire and Newport. In contrast to the surrounding authorities and Wales as a whole, Blaenau Gwent has the lowest percentage of residents (49%) working in Blaenau Gwent itself.

## Digital Connectivity

Digital connectivity has become increasingly important over the current LDP period. Ofcom suggest that there are differences throughout the UK where in 2017 the fixed broadband average download speed (Mbit/s) was 33.4 in Wales compared to 47.8 in England, where 51% of connections were made on 30Mbit/s or higher compared to 43% in Wales. Equally, Wales had a higher proportion of connections with an average of 10Mbit/s or less (25%) than England (20%).

**Figure 16: Digital Connectivity** 

Area	Superfast UK (>24 Mbps) (1)	Superfast EU (>30 Mbps) (1)	Ultrafast (>100 Mbps) (1)	Mean Upload Speed (Mbps)	Mean Download Speed (Mbps)
Blaenau Gwent	98.68%	98.04%	1.39%	5	21
Torfaen	96.83%	96.7%	30.35%	5.3	24.5
Monmouthshire	87.6%	86.95%	6.17%	5.3	22.7
Newport	97.56%	97.44%	68.62%	6.8	33.7
Wales	94.7%	94.30%	33.76%	5.8	26.2
England	95.87%	95.57%	57.23%	6.9	31.4

Source: ThinkBroadband

Blaenau Gwent performs well in terms of superfast speeds but very poorly in terms of ultrafast and mean download speeds.

### **Tourism**

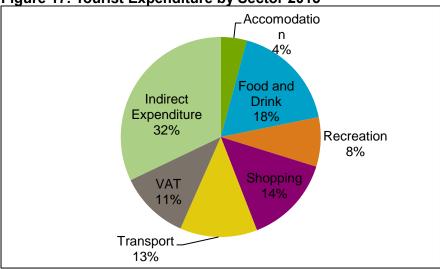
## Tourism Expenditure

The Local Authority continually monitors the volume and value of tourism and uses the Scarborough Tourism Economic Activity Monitor (STEAM) to achieve this. The 2015 reports shows that Blaenau

<sup>(1)</sup> Coverage percentages include both residential and business premises and is based around postcode level data.

Gwent received 675,530 visitors who spent a total of 864,250 days in the area. These visits brought £43.2 million into the local economy and supported the full time equivalent of 582 jobs. Since the last Destination Management Plan the area has seen a growth of 7.2% visitors. These visitors have contributed an extra 10.7% into the local economy with an 8.8% increase in those directly employed in tourism.





Source: Blaenau Gwent County Borough Council STEAM Report

**Tourist Accommodation** 

Figure 18: Bedstock - Serviced Accommodation

Serviced Accommodation	2015		Change on 2004	
	Est.	Beds	Est.	Beds
Serviced Accommodation Total	17	287	+2	+109
+50 room hotels	0	0	0	0
11-50 room hotels	2	141	+1	+110
<10 room hotels/others	15	146	+1	-1

Source: Blaenau Gwent County Borough Council STEAM Report

Figure 19: Bedstock - Non Serviced Accommodation

Non Serviced	2015		Change on 2004	
Accommodation	Est.	Beds	Est.	Beds
Non Serviced Accommodation Total	3	188	-1	+20
Self catering	2	8	-1	-28
Static caravans/chalets	0	0	0	
Touring caravans/camping	1	180	0	+48

Source: Blaenau Gwent County Borough Council STEAM Report

In total, the bedstock for Blaenau Gwent is 475 bedspaces. Over half (60%) are serviced bedspaces, 1.7% are self-catered with the remaining 38% being caravan and camping bedspaces. The number of bed spaces has increased in serviced and non-serviced accommodation since 2004. The most significant increase being in serviced accommodation of 11-50 room hotels which reflects the opening of a national chain hotel in Ebbw Vale and its recent extension. The number of beds from touring caravans and camping has also grown this is a reflection of the annual Festivals.

### **Tourist Information Centre**

Blaenau Gwent has one tourist information centre at Parc Bryn Bach, Tredegar.

## Retail

# Retail Hierarchy

The Retail Hierarchy for Blaenau Gwent is defined by the Local Development Plan as follows:

# **Principal Town**

Ebbw Vale

### **District Town Centres**

- Abertillery,
- Brynmawr
- Tredegar

## **Local Town Centres**

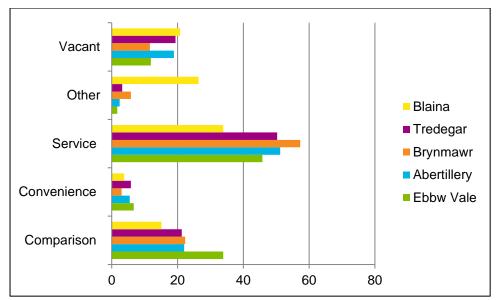
Blaina

Since the adoption of the LDP, work has been undertaken to identify neighbourhood centres as follows:

- Marine Street, Cwm, Ebbw Vale
- Park Place, Waunlwyd, Ebbw Vale
- · Church Street, Ebbw Vale
- Hilltop Shopping Centre, Tredegar Road, Ebbw Vale
- Beaufort Rise, Ebbw Vale
- Cambridge Gardens, Ebbw Vale
- Queensway, Garnlydan, Ebbw Vale
- · Attlee Way, Tredegar
- Park Place, Tredegar
- Alexandra Road, Six Bells
- Commercial Road, Llanhilleth

Retail uses in town centres

Figure 20: Retail Uses in Town Centres

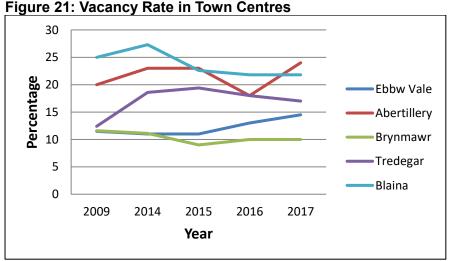


Source: Blaenau Gwent County Borough Council Annual Town Centre Surveys 2017

The 2017 Blaenau Gwent County Borough Council annual town centre surveys recorded a range of uses within the town centres and reflects a wider trend of a decrease in the proportion of convenience outlets and an increase in the proportion of service outlets.

# Vacancy Rates

The overall vacancy rate for the town centres is 16.4% (2017). The Welsh national average town centre vacancy rate is 13% (January 2018). The overall Blaenau Gwent vacancy rate is higher than the town centre welsh average.



Source: Blaenau Gwent Annual Town Centre Survey Information

The current vacancy rate for Ebbw Vale is 11.9% (2017) which compares favourably to the Welsh average of 13% (January 2018). Ebbw Vale Town Centre has performed reasonably since 2009 with some increases and decreases over the period. The vacancy rate is 0.4% higher than that in 2009.

The current vacancy rate (2017) for Abertillery is 18% which is 5% higher than the Welsh average in 2018. The vacancy rate is 1.2% less than in 2009, which is an improvement.

The current vacancy rate for Brynmawr town centre is the lowest for all the town centres and it has performed well in terms of its vacancy rates between 2009 and 2017. In 2017, however the vacancy rate at 11.7% was the highest recorded since 2009.

Tredegar town centre has not performed well between 2009 and 2017, experiencing an overall increase in the vacancy rate (+6.6%). The current vacancy rate of 19% remains well above the Welsh average in 2018.

Blaina's vacancy rate has reduced by 4.2% between 2009 and 2017 with a current figure of 20.8%. Whilst this indicates that the Town Centre's performance has improved, it should be recognised that the vacancy rate remains the highest of all town centres within the County Borough and continues to be significantly above the Welsh average in 2018.

### Footfall

The Council also monitors annual footfall data per annum for each town centre. The figure below highlights the changes over a five year period between 2010 and 2015. Here it can be seen that all town centres have generally experienced a gradual decline in footfall over this period, indicating that the town centres are less vibrant and attractive to shoppers. It should be noted that Abertillery's anomalous reduction in footfall during 2014 was the result of reduced levels of access caused by physical improvement works to the Town Centre.

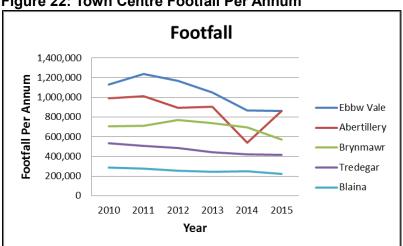


Figure 22: Town Centre Footfall Per Annum

Source: Blaenau Gwent County Borough Council

## **Education**

There are 22 primary schools in Blaenau Gwent, spread throughout the County Borough. There are 6 in and surrounding Ebbw Vale, 5 in Tredegar, 3 in Nantyglo and Blaina, 2 in Brynmawr and 2 in Llanhilleth. The Abertillery Learning Community provides 3-16 learning for primary and secondary age pupils based on 5 campus sites; 4 of which are primary and 1 is a secondary school. In addition to the 1 secondary school in Abertillery, there are a further 3, 1 in Ebbw Vale, 1 in Tredegar and 1 in Brynmawr. There is also a special educational needs school in Ebbw Vale.

Blaenau Gwent has one higher educational establishment within its boundary that is home to all a-level education in Blaenau Gwent and vocational courses for a broad range of industries - The Learning Zone, The Works, Ebbw Vale.

# Qualifications

Figure 23 shows that across the Gwent region there was variation in the percentage of working age population with no qualifications. In 2017, the percentage for Blaenau Gwent, at 12.2%, was more than double that of Monmouthshire. The value for Wales was 8.7%.



Source: Nomis

Figure 24 shows the percentage of the working age people with no qualifications over the period 2012 to 2017. Between 2014 and 2015 Blaenau Gwent saw an increase of 6.2% points in the percentage of the working age population with no qualifications. However in 2017 the percentage decreased to 12.2%.

**Local Authority** 

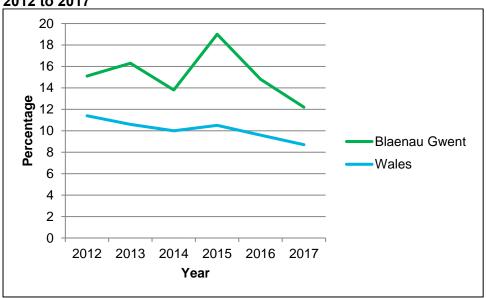
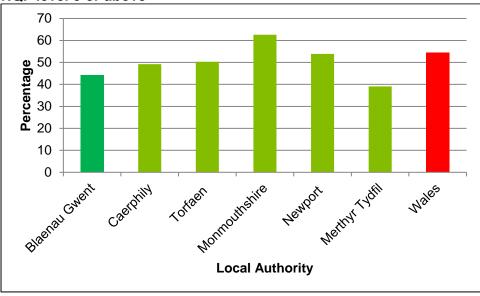


Figure 24: Percentage of the working age people with no qualifications over the period 2012 to 2017

Source: Nomis

Figure 25 shows that in 2017 the percentage of working age people in the Gwent region who are qualified to NQF level 3 or above ranged from 44.2% in Blaenau Gwent to 62.6% in Monmouthshire. This compares with 54.6% for Wales.

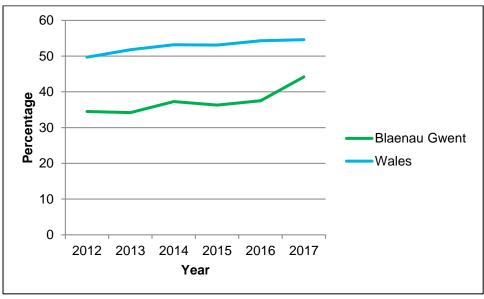
Figure 25: Percentage of working age people in the Gwent region who are qualified to NQF level 3 or above



Source: Nomis

Figure 26 below shows the percentage of working age people qualified to NQF level 3 or above over the period 2012 to 2017. Blaenau Gwent saw an increase of 9.7% over the period. For Wales the increase was 4.9%. Whilst the gap between Blaenau Gwent and Wales has narrowed, Blaenau Gwent remains behind Wales.

Figure 26: Percentage of working age people qualified to NQF level 3 or above over the period 2012 to 2017



Source: Nomis

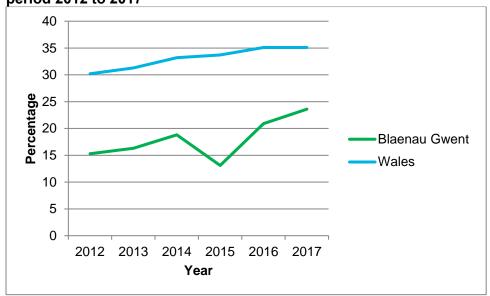
Figure 27 shows that, in terms of higher level qualifications, in 2017 the percentage of working age people in the region qualified to NQF level 4 or above ranged from 23.6% in Blaenau Gwent to 45.3% in Monmouthshire. The figure for Wales was 35.1%.

Figure 27: Percentage of working age people in the region qualified to NQF level 4 or above

Source: Nomis

Figure 28 shows the percentage of working age people qualified to NQF level 4 or above over the period 2012 to 2017. In Blaenau Gwent there was an increase of 8.3% over the period. This compared with an increase of 4.9% for Wales over the same period. Whilst the gap between Blaenau Gwent and Wales has narrowed, Blaenau Gwent remains behind Wales and therefore the percentage of working age people achieving higher qualifications remains an issue.

Figure 28: Percentage of working age people qualified to NQF level 4 or above over the period 2012 to 2017



Source: Nomis

# **Evolution of the baseline without the RLDP**

The baseline of negative population growth over time provides a challenging context in which to deliver significant improvements to education attainment and enhanced economic vitality. However, future development could theoretically present opportunities to unlock investment in education and training which would have flow on effects on the local economy and employment rates. However, low rates of

future growth may offer only limited opportunities to seek additional investment, particularly at a strategic scale.

# 2.0 A Resilient Wales

# Air

The UK's National Air Quality Strategy sets air quality objectives for seven key pollutants which local authorities are legally required to have regard to. These include: Benzene; 1, 3-Butadiene; Carbon Monoxide; Lead; Nitrogen Dioxide; Particulate Matter (PM10) (gravimetric); and Sulphur Dioxide. Part IV of the Environment Act 1995 requires local authorities to produce annual air quality reports as part of this National Strategy and these reports have been produced for Blaenau Gwent since 2004.

The reports look at local air monitoring data and sources of air pollution within the area to assess the likelihood of any of the National Air Quality Objectives being exceeded. Typical significant sources of air pollution include road traffic and industrial facilities. Within Blaenau Gwent a network of passive Nitrogen Dioxide monitoring diffusion tubes are utilised to provide an indicator of local air quality. Since the establishment of this network no exceedances of the air quality objective for Nitrogen Dioxide have been detected and the levels of Nitrogen Dioxide typically recorded are less than 50% of the national air quality standard, indicating that the air quality in Blaenau Gwent is good.

Assessments of the sources of atmospheric emissions within the area indicate that none of the standards set out for the other pollutants in the National Air Quality Strategy are currently likely to be exceeded.

# **Biodiversity, Flora & Fauna**

Statutory Environmental Designations

There is a wide range of habitats in Blaenau Gwent. The more significant habitats include:

### **Specials Area of Conservation:**

- None within the Blaenau Gwent County Borough Local Planning Authority boundary
- There are two Special Areas of Conservation adjacent to the boundary which are: Usk Bat Site and Cwm Clydach Woodlands.

### Sites of Special Scientific Interest

- Cwm Merddog Woodlands
- Brynmawr sections
- Mynydd Llangynidr

#### **Local Nature Reserves (LNRs)**

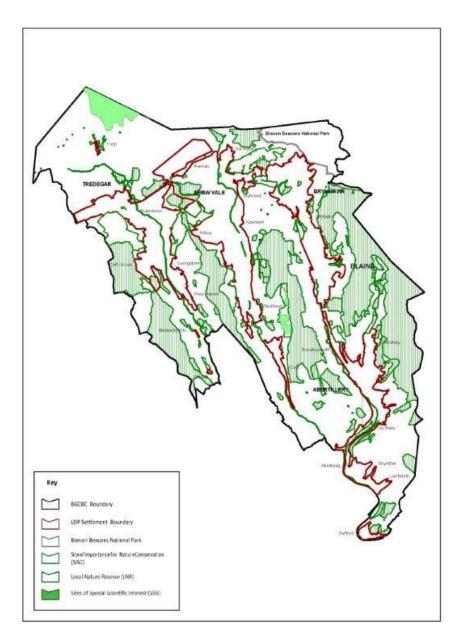
• The LDP identifies that there are 6 Local Nature Reserves. There have been a further 5 designated since 2012, bringing the total number of LNRs to 11.

#### **Site of Importance for Nature Conservation (SINC)**

• The LDP identifies 137 SINCs. In 2015, a further 11 were designated, bringing the total number of SINCs to 148.

Figure 29 below shows the statutory environmental designations including Sites of Special Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation.

## Figure 29: Statutory Environmental Designations



Source: Blaenau Gwent County Borough Council

# Protected and Rare Species

The Conservation (Natural Habitats, & c.) Regulations 1994 sets out the European protected species. A number of schedule 2 species are located within Blaenau Gwent including: horseshoe bats (lesser and greater horseshoe), other bats, great crested newts and otters.

The Wildlife and Countryside Act 1981 sets out the UK protected species. The UK protected species that are found within Blaenau Gwent include: bats, brown hare, dormouse, otter, water vole, common frog, common toad, great crested newt, palmate newt, smooth newt, adder, common lizard, grass snake, slow worm, butterflies, marsh fritillary, pearl bordered fritillary, moths and double line lichens.

UK Biodiversity Action Plan and UK Post 2010 Biodiversity Framework Habitats

A number of UK Biodiversity Action Plan habitats are also found in Blaenau Gwent including: wet woodland; Lowland Beech and Yew Woodland; Lowland Mixed Deciduous Woodland; Upland Oak Woods; Lowland Meadow; Lowland Calcareous Grassland; Lowland Dry Acid Grassland; Purple Moorgrass and Rush pastures; Upland Heath; Lowland Heath; Blanket Bog; Lowland Raised Bog; Upland

Flushes, Fens and Swamp; Mesotrophic Lakes; Ponds; hedgerows; inland rock outcrop and scree; and open mosaics on previously developed land and rivers and streams.

#### Blaenau Gwent Local Biodiversity Action Plan

The 2015 Blaenau Gwent Local Biodiversity Action Plan contains Habitat Action Plans for 26 priority habitats which have been identified within Blaenau Gwent. Six Species Action Plans have been prepared for individual species such as otter or groups of species such as bats. These species require more specific actions that cannot be undertaken under a Habitat Action Plan. Each Specific Action Plan gives specific descriptions of the species along with specific actions for conservation. SAPs have been prepared for:

- Bats
- Birds
- Otters
- Pollinating insects
- · Reptiles and amphibians
- Invasive species

Generic Action Plans have been prepared for common themes are integral to all Habitats and Species Action Plans. These include:

- Local Biodiversity Action Plan process
- Education and raising awareness of biodiversity

### Invasive Plants

The issue of invasive plants is an on-going problem within Blaenau Gwent, there is a duty in terms of development not to spread and more invasive species. The two major concerns are with Japanese Knotweed and Giant Hogweed. The Council has had a very successful project to eradicate Japanese Knotweed along river corridors.

#### Biodiversity Loss

The five drivers of biodiversity loss are: climate change, habitat loss and change, pollution, invasive non-native species and exploitation. The primary cause of species extinction globally is habitat loss. **There is a data gap in relation to biodiversity loss in Blaenau Gwent.** 

# Habitat Fragmentation

Habitat fragmentation involves the breaking up of large areas of habitat into small, unconnected islands. These habitat fragments are often too small to support viable populations of many plant and animal species, leaving them vulnerable to extinction. As a result species that have taken tens or hundreds of thousands of years to evolve naturally can be lost very quickly and cannot be recreated.

## There is a data gap in relation to habitat fragmentation in Blaenau Gwent.

# Soil

## Peatland

Figure 30 shows that almost all of the peat resource of Blaenau Gwent occurs in the uplands and north of the A465, with small pockets between the Rhymney & Sirhowy Valleys. Small areas of peatland are in the Mynydd Llangynidr SSSI. Development is likely to have resulted in loss of peat in the past, and a significant area of peat will be affected if the Circuit of Wales proposal goes ahead.

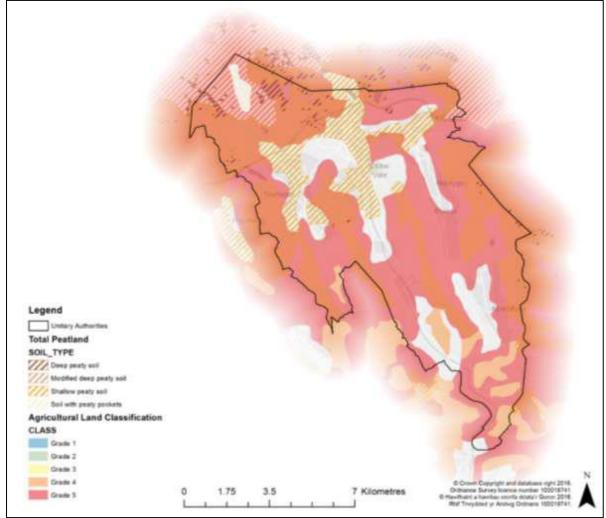


Figure 30: Peatland and Agricultural Land in Blaenau Gwent

Source: NRW, 2016

Wet peat soils are unlikely to have been recognised or valued in the area, leading to inappropriate management for at least some of the sites. The occurrence of peat within large unenclosed upland blocks hampers focussed management.

Restoring peat can bring benefits to people, the environment and contribute to climate change resilience, by storing and regulating the flow of water, improving water quality, and storing carbon.

Semi natural peatland vegetation in good condition delivers the widest range of ecosystem services. Restoring all areas of peatland in Wales with semi natural vegetation is a Welsh Government priority.

Deep peat soils (peat soils over 50cm deep) occur throughout Wales and are one of our critical natural assets. Peat supports the largest amount of soil carbon per unit area of any soils and when in good condition in mires (wetlands) play a very important role in climate change by locking up carbon from the atmosphere.

The characteristic habitats, plant and animal species associated with peatlands are a key feature of Wales's biodiversity and all public bodies have a duty to enhance and maintain them. Peatlands in good condition help sustain rivers and streams during dry periods; help retain or slow-down runoff and in doing so form part of our range of natural flood risk management assets. Peatlands contribute to the character and landscape quality of Wales, providing wild, but accessible places for people and nature.

### Agricultural Land

Figure 30 above identifies that the majority of agricultural land within Blaenau Gwent is grade 5 with areas to the southern end of the borough being grade 4. Grade 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land. The borough does not have any grade 1, 2 or 3a land, which are the top three grades referred to as 'Best and Most Versatile' land and enjoy significant protection from development.

#### Contaminated Land

In order to assist in discharging duties associated with contaminated land, Blaenau Gwent Council produced a contaminated land strategy in 2002 where it identified 1607 potentially contaminated sites, of which:

- 51 were considered to be high risk (previous or current use include gas works, landfill sites, petrol stations and military land);
- 880 were considered to be medium risk; and
- 676 were considered to be low risk.

It has not been possible to identify the actual number of sites that have been remediated since the date of the strategy. However, a number of sites with a history of contaminative usage which have been remediated include: The Works, Ebbw Vale; the former British Coal Workshops, Tredegar; and the Dunlop Semtex site at Brynmawr.

Through the LDP annual monitoring process and monitoring of planning applications it has been possible to monitor the number and area of contaminated land sites which have been remediated through development. The following figure sets out this information since 2012:

Figure 31: No. and area of contaminated land sites to be remediated through development

Year		Area of contaminated land to be remediated through development (hectares)
2012-2014	5	2.93
2014-2015	0	0
2015-2016	1	1.85
2016-2017	0	0
2017-2018	3	3.67
Total	9	8.45

Source: Blaenau Gwent Annual Monitoring Report 2017-18

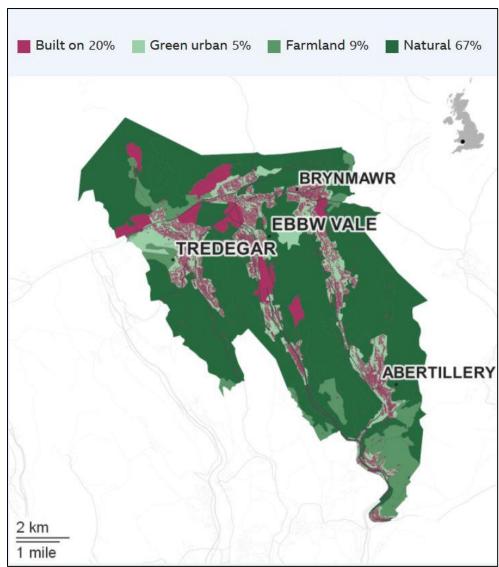
Use of brownfield sites – previously developed land

Figure 32: How much of the area is built on?

	Blaenau Gwent	Wales	UK
Built on	20%	4.2%	6%
Green Urban	5%	1.4%	3%
Farmland	9%	59.3%	57%
Natural	67%	35.1%	35%

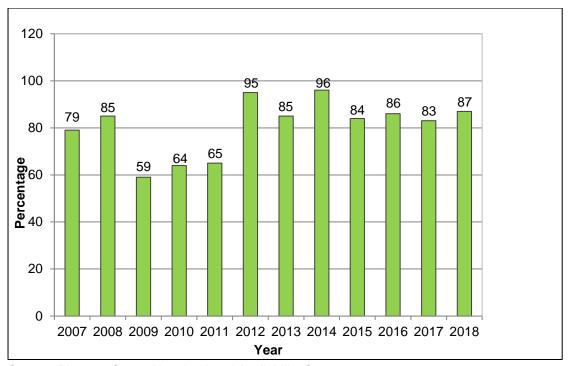
Source: Corine Land Cover Inventory

Figure 33: How much of the area is built on?



Source: Corine Land Cover Inventory (insert BBC link)

Figure 34: Percentage of housing completions on brownfield land between 2007 and 2018



Source: Blaenau Gwent Housing Land Availability Surveys

The figures for the percentages of housing completions on brownfield land have been determined using the Blaenau Gwent County Borough Council Housing Land Availability Surveys which are conducted on an annual basis. The average percentage of housing completions on brownfield land over the past 12 years is approximately 81%.

The LDP contains a target of 80% of new development to be on brownfield land which is monitored annually through the LDP Annual Monitoring Report.

Figure 35: New Development on Brownfield land

Year	Size (Ha) on brownfield	Size (Ha) of Total Development permitted	% on brownfield land
2006-2013	136.341	177.461	76.8%
2013-2014	5.42	241.42	2.2%
2014-2015	22.41	26.52	84%
2015-2016	14.38	19.32	74%
2016-2017	13.3	14.36	93%
2017-2018	15.69	18.33	86%

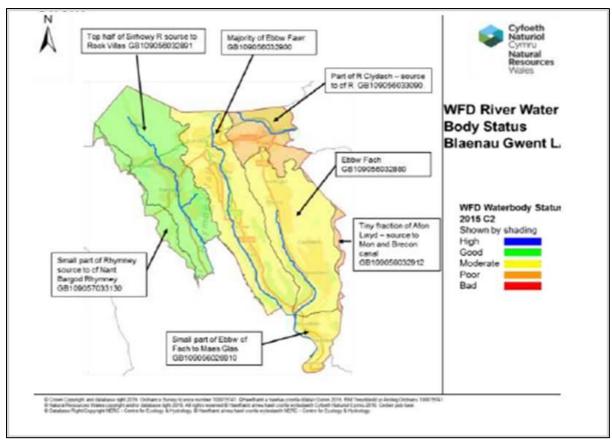
Source: Blaenau Gwent Annual Monitoring Report 2017-18

# **Water Quality**

Our water bodies are assigned a status of health which is represented in the Figure below. Waterbodies that are classified as 'Bad', 'Poor' or 'Moderate' are failing the EU Water Framework Directive standards and these waterbodies will need to improve to at least 'Good' ecological status by 2027.

In Blaenau Gwent there are waterbodies classed as good. However most are 'moderate' or 'poor'. None are 'bad'.

Figure 36: Water Framework Directive Status of Rivers in Blaenau Gwent



Source: Blaenau Gwent Well-being Assessment

Where rivers are failing for fish this is primarily down to three causes: physical modification to the waterbody; the quality of the aquatic water habitat; and water quality. Figure 37 shows the failing elements of watercourse in Blaenau Gwent.

Figure 37: WFD Classification with failing elements of watercourses in Blaenau Gwent

Watercourse as shown in Figure 36	WFD Classification	Failing Element
River Sirhowy	Good	Not applicable
River Ebbw Fawr	Moderate	<ul><li>Fish (salmon)</li><li>Phosphate</li></ul>
River Clydach	Poor	<ul><li>Fish (eel &amp; bullhead)</li><li>Phosphate</li></ul>
River Ebbw Fach	Moderate	<ul><li>Fish (salmon)</li><li>Invertebrates</li></ul>
River Afon Lwyd	Poor	<ul><li>Fish (salmon &amp; bullhead)</li><li>Manganese</li></ul>
River Ebbw	Moderate	<ul><li>Mitigation Measures Assessment</li><li>Tributyltin</li><li>Water resources</li></ul>
River Rhymney	Good	Not applicable

Source: Natural Resources Wales, 2016

Physical modifications such as manmade weirs are present due to industrialisation and urbanisation. They present barriers that prevent fish from migrating upstream to their spawning grounds. The pressure on fish and the wider ecology is increased by degraded habitat such as poor quality spawning

grounds. Phosphorus from sewerage discharges and misconnections of pipes from residential and industrial estates also impacts on fish.

The phosphorous issue on the River Clydach is being addressed by Dwr Cymru / Welsh Water with the upgrading of the waste water treatment works at Brynmawr. On the River Afon Lwyd the manganese is found because of historical mines discharging into rivers. The source of the tributyltin in the River Ebbw is unknown. Whilst the water resources issue is the Newport Dock feeder abstraction at Bassleg Weir, further downstream.

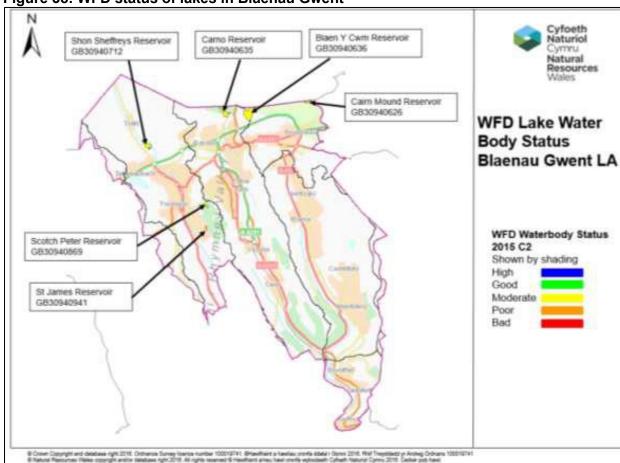


Figure 38: WFD status of lakes in Blaenau Gwent

Source: Natural Resource Wales, 2016

Figure 39 shows that the six reservoirs in Blaenau Gwent are classed as moderate, and are primarily failing because they are artificial/heavily modified waterbodies.

Figure 39: WFD Classification with failing elements of waterbodies in Blaenau Gwent

Waterbody as shown in Figure 38	WFD Classification	Failing Element
Shon Sheffreys Reservoir	Moderate	<ul><li>Mitigation Measure Assessment</li><li>Phosphorus</li><li>Macrophytes</li></ul>
Carno Reservoir	Moderate	<ul><li>Mitigation Measure Assessment</li><li>Phosphorus</li></ul>
Blaen y Cwm Reservoir	Moderate	<ul><li>Mitigation Measure Assessment</li><li>Phosphorus</li></ul>
Cain Mound Reservoir	Moderate	Mitigation Measure Assessment

		•	Expert Judgement – At risk from Acidification, Phosphorous & Hydro morphology
St James Reservoir	Moderate	•	Mitigation Measure Assessment Expert Judgement – At risk from Acidification, Phosphorous & Hydro morphology
Scotch Peter Reservoir	Moderate	•	Mitigation Measure Assessment

Source: Natural Resources Wales (NRW) 2016

The lakes listed are all reservoirs and are important for water supply in Blaenau Gwent. They are primarily failing because they are artificial/heavily modified waterbodies.

### Water Supply

Water is supplied to the Blaenau Gwent area by Dwr Cyrmu/Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. This Water Resources Zone (WRZ) is known as the South East Wales Conjunctive Use System (SEWCUS).

In total, there are over 40 resources that are used to supply the SEWCUS WRZ (Figure 98) which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas.

# **Material Assets – Minerals and Waste**

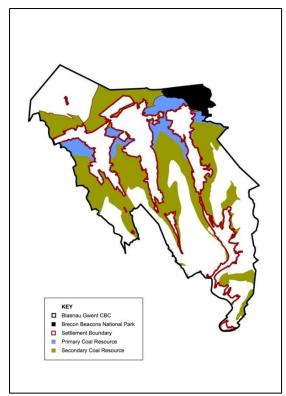
### **Minerals**

Blaenau Gwent County Borough Council lies on the north eastern edge of the South Wales coalfield. The Coal Measures underlie the majority of the County Borough as shown in the figure below. The area has a legacy of deep coal mining and open cast coal mining.

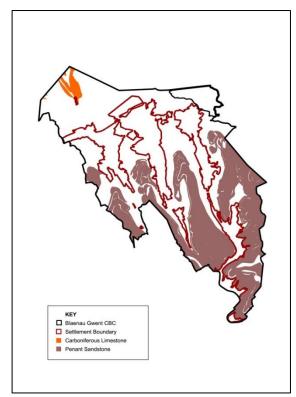
The coal bearing rocks are overlain in the south of the County Borough by Pennant Sandstone, predominantly the Hughes and Grovesend Beds. The properties of the Pennant Sandstone in Blaenau Gwent make it suitable for use as High Specification Aggregate (HSA) as well as general aggregate and building stone. HSA is used where a high degree of skid resistance is required like motorways and airport runways. The availability of such materials is limited to relatively few locations in England and Wales and is therefore a nationally important resource.

There is an outcrop of Carboniferous Limestone on the edge of the coalfield in the north of the County Borough. The Limestone is versatile being used not only in construction but also for cement production.

# Figure 40: Coal Safeguarding Areas



Source: Blaenau Gwent Local Development Plan (2012)



Source: Blaenau Gwent Local Development Plan (2012)

Figure 41: Aggregate Safeguarding Areas

The existing Local Development Plan seeks to secure that there is an adequate supply of minerals through Policy SP12. To ensure this is achieved the land bank and the extent of required capacity is monitored. The following are results from the Annual Monitoring Report 2017-18:

Figure 42: Number of years land bank of permitted aggregate reserves

Year	No. of years land bank of permitted reserves
2013	11.8
2014	10
2016	7

Source: Blaenau Gwent Annual Monitoring Report 2017-18

The latest Regional Technical Statement (RTS) for South Wales identifies that Blaenau Gwent need 4.25 million tonnes from 2011 to 2036 and had 3 million tonnes consented at the base date. This equates to 71% of the total capacity required. As no further consents have been granted this remains the same.

#### Waste

Over the past decade, Wales has transformed the way it deals with waste by increasing its recycling rate from 13% (2002/03) to 56.2% (2014/15).

Towards Zero Waste is the overarching strategy document for Wales and was published in 2010. TZW sets out at a high level strategy for how we are to manage waste in Wales to produce benefits not only for the environment, but also for our economy and social wellbeing. The strategy outlines the actions we must take if we are to realise the ambition of becoming a high recycling nation by 2025 and a zero waste nation by 2050.

TZW sets targets for municipal waste collected by area. The recycling targets became law from April 2012 under the Waste (Wales) Measure 2010. The first statutory target was to reuse, recycle or compost 52% of municipal waste collected by local authorities in 2012-13. The next target is 64% in 2019/20. Targets are outlined in Figure 43.

Figure 43: Targets for municipal waste collected by area

Target for:	2015/16	2019/20	2024/25	2050
Minimum levels of preparing for reuse and recycling/ composting (or anaerobic digestion		64%	70%	Zero Waste Nation
Minimum proportion of preparing for reuse/recycling/composting that must come from source separation (kerbside, bring and/or CA site) for municipal waste		80%	80%	

Source: Blaenau Gwent Well-being Assessment

Figure 44 shows the percentage of municipal waste sent for reuse, recycling or composting across the Gwent region in 2016-17. This ranged from 56.8% of municipal waste in Blaenau Gwent to 68.7% of municipal waste in Monmouthshire. This compares to 63.8% for Wales.

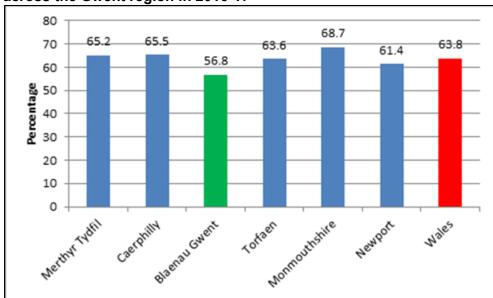
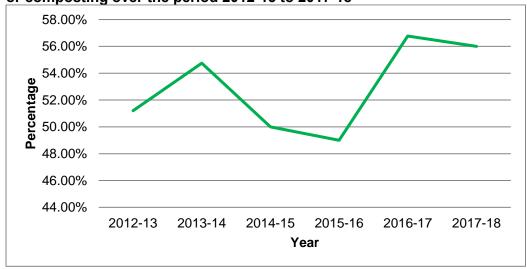


Figure 44: Percentage of municipal waste sent for reuse, recycling or composting across the Gwent region in 2016-17

Source: StatsWales

Figure 45 below shows the change in the percentage of municipal waste sent for reuse, recycling or composting over the period 2012-13 to 2017-18. In 2015-16, there was a marked decrease in the percentage this was due to the introduction of a new recycling service. Overall, the percentage has increased by 4.8% over the period in Blaenau Gwent.

Figure 45: The change in the percentage of municipal waste sent for reuse, recycling or composting over the period 2012-13 to 2017-18



Source: StatsWales

#### **Evolution of the baseline without the RLDP**

Habitats and species could have the potential to come under increasing pressure from the provision of new housing, employment and infrastructure in Blaenau Gwent, including at designated sites. This could include increased disturbance (recreational, noise and light) and atmospheric pollution as well as the loss of habitats and fragmentation of biodiversity networks. Habitat loss and fragmentation could be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

However, new development can also lead to opportunities to seek habitat creation or enhancement, including provision of green infrastructure. There could be potential for development within the County

Borough to improve green infrastructure networks across Blaenau Gwent as well as in the wider Cardiff City Region. To maintain and improve the condition of biodiversity in the future it will be important to not only protect and enhance important habitats but to identify and enhance the connections between them.

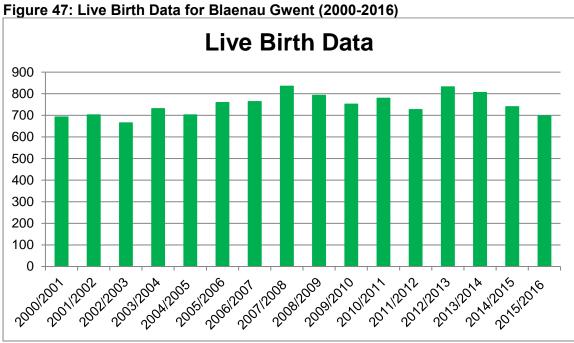
The low baseline sensitivity in relation to air quality and soils is considered unlikely to be significantly affected through future development, particularly in light of recent trends for low rates of housing completions in Blaenau Gwent. Similarly, water resources, water quality, waste processing and minerals extraction are unlikely to be notably affected by future development in the plan area if similar housing completion rates continue into the future.

# 3.0 A Healthier Wales

# **Human Health**

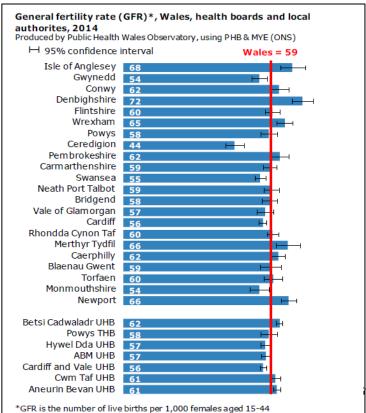
#### Birth and death rates

Figure 48 shows the General Fertility Rate (GFR) that is the total number of live births per 1,000 women of reproductive age (aged 15-59) in a population year was 59 for Blaenau Gwent in 2014 which was the same as the Welsh average. However birth data in Figure 47 shows that births fluctuated between 698 and 835 over the last 15 years. The data does not identify any overall trend.



Source: Stats Wales

Figure 48: General Fertility Rate



went is in line with the Welsh average.

from just over 900 a year in 2001-2002 to

between 700 and 800 since 2013 to 2014. However, in terms of the Standard Mortality rate Blaenau Gwent at a rate of 115 to 118 has higher than the expected number (the norm) of 100. The latest available figures show that it has stabilised at a rate of 116 between 2006 and 2019.

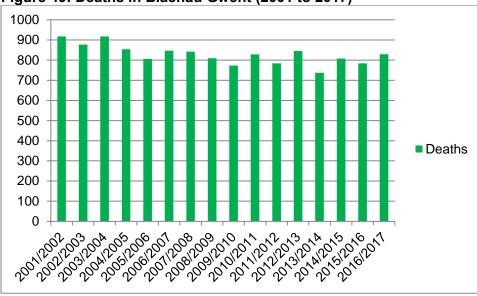


Figure 49: Deaths in Blaenau Gwent (2001 to 2017)

Source: Stats Wales

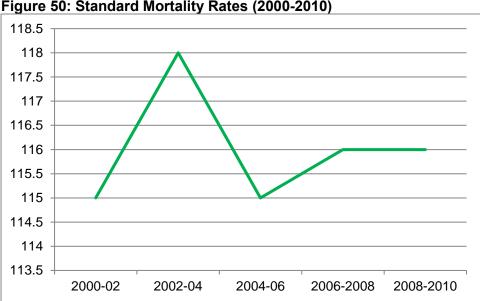


Figure 50: Standard Mortality Rates (2000-2010)

Source: Stats Wales

# Teenage Conceptions

Figure 51 highlights the teenage conception rate in those aged under 16 in Blaenau Gwent and Wales. The data indicates that although the Blaenau Gwent figures were much higher than the Welsh average in 2001-03 the figures have now decreased and are generally in line with the Welsh average. It should be noted that there were no figures available for Blaenau Gwent in 2015 and 2016. The overall trend is a decrease.

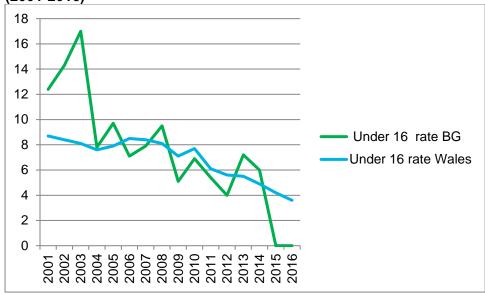
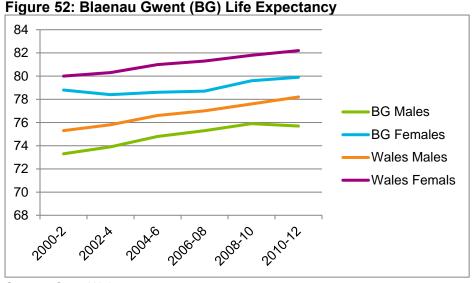


Figure 51: Conceptions for age group under 16 for Blaenau Gwent (BG) and Wales (2001-2016)

Source: Stats Wales

## Life Expectancy

Life expectancy in Blaenau Gwent in 2010-12 was 75.7 for males and 79.9 for females compared to the average for Wales of 78.2 and 80.1 respectively. The average life expectancy for both males and females in Blaenau Gwent is generally increasing. However life expectancy in Blaenau Gwent remains well below the Wales average and in terms of females the difference has increased over the period from 1.2 to 2.3 years. Life expectancy for males tracked the overall trend until the period 2010-12 when Blaenau Gwent failed to keep up with the overall trend of improvement. For Males the difference of 2 years in 2000-2002 has grown to 2.5 in 2010-2012.



Source: Stats Wales

Figure 53 presents data relating to the WIMD 2014 for health. Patterns in health deprivation in Wales have remained largely unchanged since the 2011 WIMD. High deprivation levels were recorded in South Wales valleys and large cities, coastal areas of North Wales and border towns. The local authority with the highest proportion of LSOAs in the most deprived 10% in Wales for health domain was Merthyr Tydfil, Blaenau Gwent came in at the 5<sup>th</sup> highest. Three local authorities (The Isle of Anglesey, Ceredigion and Monmouthshire) were recorded as having had no LSOAs in the most deprived 10%.

Blaenau Gwent had the highest proportion of LSOAs in the most deprived 50% in Wales (95.7%). The next highest was Merthyr Tydfil, with 86.1% of its LSOAs in the most deprived half of Wales. Isle of Anglesey, Ceredigion and Monmouthshire had no LSOAs in the most deprived 10%. Only 15.2% of the LSOAs in Ceredigion were in the most deprived 50% in Wales.

Figure 53: WIMD 2014 Health domain deprived LSOAs, by local authority

Local Authority	Number of LSOAs in local authority	% LSOAs in most deprived 10% ranks 1-191	% LSOAs in most deprived 20% ranks 1-382	% LSOAs in most deprived 30% ranks 1-573	% LSOAs in most deprived 50% ranks 1-955
Isle of Anglesey	44	0.0	4.5	15.9	29.5
Gwynedd	73	2.7	4.1	5.5	19.2
Conwy	71	1.4	7.0	15.5	31.0
Denbighshire	58	10.3	15.5	22.4	37.9
Flintshire	92	2.2	8.7	17.4	34.8
Wrexham	85	4.7	16.5	27.1	50.6
Powys	79	1.3	5.1	8.9	19.0
Ceredigion	46	0.0	0.0	4.3	15.2
Pembrokeshire	71	4.2	7.0	12.7	31.0
Carmarthenshire	112	4.5	11.6	29.5	55.4
Swansea	148	14.2	20.9	29.7	54.7
Neath Port Talbot	91	17.6	36.3	50.5	72.5
Bridgend	88	12.5	29.5	45.5	61.4
Rhondda Cynon Taf	154	21.4	43.5	56.5	77.3
Merthyr Tydfil	36	30.6	47.2	58.3	86.1
Caerphilly	110	20.0	32.7	45.5	74.5
Blaenau Gwent	47	14.9	40.4	61.7	95.7
Torfaen	60	6.7	21.7	33.3	61.7
Monmouthshire	56	0.0	0.0	1.8	17.9
Newport	95	8.4	22.1	33.7	52.6
Cardiff	214	14.5	22.0	29.9	44.4
Wales	1909	10.0	20.0	30.0	50.0

Source: WIMD

### Percentage of good/bad health

Figure 54: Self-Assessment of General Health

General Health	Blaenau Gwent (%)	Wales (%)
'Very Good Health'	41.9	46.6
'Good Health'	30.6	31.2
'Fair Health'	16.7	14.6
'Bad Health'	8.2	5.8
'Very bad health'	2.5	1.8

Source: Census 2011

In 2011 77.8% of people in Wales reported their general health as either 'Very good' or 'Good'. This is 3.6% lower than that of England (81.4%). The gap between local authorities reporting the highest (Cardiff: 81.4%) and lowest (Blaenau Gwent: 72.5%) percentages of 'Very good' and 'Good' general health was 8.9%. The concentration of low percentages of 'Good' general health recorded in 2011 corresponds with the former coal mining and heavy industrial centres of the Welsh valleys in 2011 suggesting that these former industries have had long term health implications. Cardiff, Gwynedd and Flintshire were identified as having the best levels of general health (ONS).

#### Lifestyles

The National Survey for Wales 2017/18 records data on lifestyle and behavioural choices for adults. Indicators such as the prevalence of smoking and obesity in Blaenau Gwent are compared with those for Aneurin Bevan Health Board and Wales as a whole in Figure 55 below. Blaenau Gwent has a higher proportion of smokers and e-cigarette users (31%) than Wales (26%) and the Aneurin Bevan Health Board (27%). In terms of alcohol, Blaenau Gwent has a lower percentage (16%) of those who consume more than 14 units of alcohol on a weekly basis than Wales as a whole (19%) and the Aneurin Bevan Health Board (18%). In terms of obesity levels, Blaenau Gwent has a higher percentage (33%) when compared to Aneurin Bevan Health Board (26%) and Wales (22%) which could be linked to the low percentage of people eating 5 portions of fruit and vegetables (18%) and the higher percentage of people doing less than 30 minutes of activity (39%).

Figure 55: Health Related Lifestyle of Adults 2017-18

	Blaenau Gwent (%)	Aneurin Bevan Health Board (%)	Wales (%)
Smoker	22	19	19
E-cigarette user	9	8	7
Weekly Alcohol Consumption > 14 units	16	18	19
Ate 5 Portions of Fruit & Vegetables	18	21	24
Active < 30 minutes a week	39	33	33
Overweight or Obese	68	65	60
Obese	33	26	22

Source: National Survey for Wales 2017-18

### Health Infrastructure

Blaenau Gwent is one of the five County Boroughs that fall within the Aneurin Bevan Health Board. Within the health board there are two general district hospitals: Nevill Hall located in Abergavenny and The Royal Gwent Hospital in Newport. There are two local general hospitals, these are: Ysbyty Aneurin Bevan which is located in Ebbw Vale and Ysbyty Ystrad Fawr, Ystrad Mynach. These are supported by

a network of community and mental health hospitals and day care premises. There are 12 GP Practices and 10 dental practices in Blaenau Gwent.

#### **Access to Services**

Number and distribution of Lower Super Output Areas (LSOAs) in bottom 10% of most deprived in terms of access to services

Latest figures for the LSOAs in Wales include average travel times for using public transport to access services. The Welsh Index of Multiple Deprivation 2014 access to services domain results have demonstrated that there is a widespread deprivation across Wales and also particularly within rural areas in terms of access. Furthermore there are some deprived pockets near large urban areas.

Blaenau Gwent, Caerphilly, Cardiff and Torfaen have no LSOAs in the most deprived 10%. The local authorities with the highest proportion of LSOAs in the most deprived 10% were Powys (46.8%) and Ceredigion (43.5%).

### **Community Facilities & Recreation**

Leisure centres are distributed throughout the Borough, one in each of the valley areas, offering swimming, sports courts and pitches: Abertillery; Ebbw Vale; and Tredegar. These centres are all operated by Aneurin Leisure Trust.

The Council owns and manages a number of parks and open spaces:

Sirhowy Valley:

Bedwellty Park

Tredegar Recreation Ground

**Ebbw Fawr Valley:** 

Beaufort Welfare Eugene Cross Park, Pantyfforest Park Hilltop Stadium

Cwm Welfare Hall

**Upper Ebbw Fach Valley:** 

Brynmawr Welfare

Brynmawr Recreation Ground

Banna Park, Nantyglo Central Park, Blaina

Pilgrims Park, Blaina

Duffryn Park, Blaina

**Lower Ebbw Fach Valley:** 

Jim Owens Recreation Ground, Cwmtillery

Woodland Park, Cwmtillery

Park, Abertillery Abertillery Park

Cwmnantygroes, Six Bells Park, Windsor Road, Six Bells

Brynithel Recreation Ground, Swffryd

Llanhilleth Park

Deficiency / surplus of provision against the standards

The appropriate amount of recreational open space is assessed against the standard of 2.4 hectares per 1,000 population, which is the standard endorsed by Fields in Trust. The existing LDP included an annual monitoring target of working towards the FIT standard of 2.4 hectares from a current standard of 1.11 ha in 2009. The following figure shows that the provision of recreational open space per 1,000 population (FIT standard) has decreased from 1.11 ha in 2009 to 0.99 ha.

Figure 46: Hectares of Recreational Open Space per 1000 Population (FIT Standard)

Year	FIT Standard (ha)
2012	1.11
2014	1.05
2015	1.02
2016	1.02
2017	0.99
2018	0.99

Source: Blaenau Gwent Annual Monitoring Report 2017-2018

#### Access to natural greenspace

The evidence base for the first LDP included an Exogesis Study (2007) which identified that 65% of the population in Blaenau Gwent live within 400m of their nearest green space. The Plan aimed to increase this to 80% through creating new open space, enhancing access to existing natural green space, managing existing green space for biodiversity, and removing barriers that prevent current access to natural green space. A number of projects of this nature has been undertaken and completed which is set out in detail in the Blaenau Gwent Annual Monitoring Reports.

Work is underway to update this work and will form part of the evidence base of the replacement plan.

There is a data gap in terms of efficiency and quality of these open spaces.

#### Evolution of the baseline without the RLDP

Baseline health outcomes are relatively poor in the County Borough in the context of Wales as a whole and there could be opportunities to seek improvements through future development, both in terms of investment in healthcare and in terms of investment in community and recreational infrastructure which can boost health and wellbeing. Major new development, particularly at a strategic scale, could bring opportunities for integrating green infrastructure and healthy lifestyle choices into new development, particularly where the benefits of this can be extended to established areas of health deprivation.

However, in the context of Blaenau Gwent, where housing delivery has been low for some time, it may be unrealistic to anticipate strategic scale growth coming forward in the absence of the RLDP. In this context there may be limited opportunities to seek strategic scale enhancement of infrastructure which supports healthy lifestyle choices, such as walking and cycling facilities and new and enhanced outdoor recreation facilities.

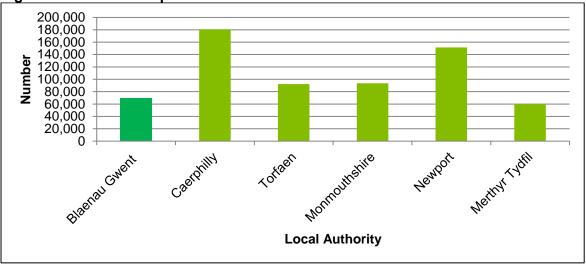
Significant changes in relation to health and wellbeing outcomes are not anticipated as a result of future development in the absence of the RLDP.

# 4. A More Equal Wales

# **Population**

In 2017, the population of Blaenau Gwent was 69,600. Figure 56 shows the mid year estimate of the number of people usually resident across the Gwent local authorities in 2017. As can be seen Merthyr Tydfil is the smallest local authority followed by Blaenau Gwent.

Figure 56: Resident Population 2017



Source: Office for National Statistics

### Population Change

Historically, the overall population in Blaenau Gwent has fallen since it peaked in 1921. The 1921 Census showed a population over 125,000 people lived in the Blaenau Gwent Area, significantly above the current population. More recently the rate of decline has been more stable, falling by just 3.4% or 2,437 people in the 20 year period between the 1991 Census (72,251) and Census 2011 (69,814). The rate of decline in the ten year period between 2001 and 2011 was the lowest rate of decline in population over a ten year period since 1921.

Figure 57: Population Change

Year	Population	Population Loss %
1921	127,611	20
1931	106,030	17
1941	99,992	5.69
1951	94,342	5.65
1961	87,796	6.94
1971	81,712	6.93
1981	75,241	7.38
1991	72,918	3.09
2001	70,058	3.92
2011	69,814	0.35

Source: Census

Figure 58: Resident Population by Ward in 2001 and 2011

Ward	oparation by train	<u></u>	
	2001	2011	% Change
Abertillery	4,490	4,416	-1.65

Badminton	3,155	3,110	-1.43
Beaufort	3,876	3,866	-0.26
Blaina	4,830	4,808	-0.46
Brynmawr	5,599	5,530	-1.23
Cwm	4,350	4,295	-1.26
Cwmtillery	4,749	4,703	-0.97
Ebbw Vale North	4,745	4,561	-3.88
Ebbw Vale South	4,199	4,274	+1.79
Georgetown	3,491	3,410	-2.32
Llanhilleth	4,776	4,797	+0.44
Nantyglo	4,293	4,635	+7.97
Rassau	3,297	3,234	-1.91
Sirhowy	5,520	5,630	+1.99
Six Bells	2,648	2,482	-6.27
Tredegar Central & West	6,046	6,063	+0.28
	72,065	69,814	

Source: Census

The above table shows the population change between 2001 and 2011. There has been a decrease in most of the wards (5 out of the 16). The highest growth was experienced in the Nantyglo ward (due to a large housing development) and the highest loss in the Six Bells ward.

### Population Density

Figure 59 below shows the population density across the Gwent region in 2015. The population density in Blaenau Gwent was 638 people per square kilometre, compared with 149 per square kilometre for Wales. Blaenau Gwent's population density is similar to neighbouring areas, all of which are significantly above the Welsh average.

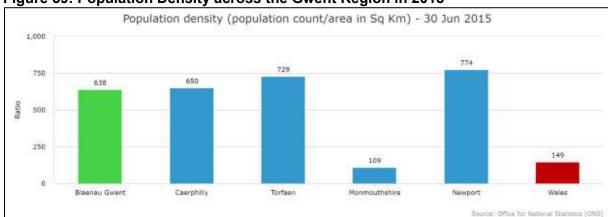
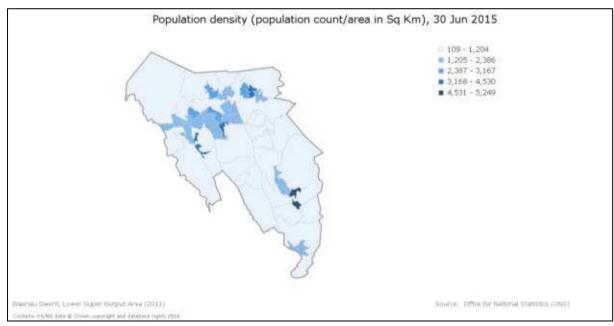


Figure 59: Population Density across the Gwent Region in 2015

Source: Office for National Statistics

Figure 60 shows the population density of each of the 47 lower super output areas (LSOA) in Blaenau Gwent. The darker areas of the map represent those areas with a higher population density. Further analysis shows some area's population density levels to be similar to those in city areas.

Figure 60: Population Density of the LSOAs



Source: Office for National Statistics

### Population by Gender

As is the case across Wales and the UK, the 2015 mid-year estimates show that there are slightly more females (51%) than males (49%) in Blaenau Gwent. There is also little difference from the Welsh average when considering gender split across each of the key age bands, varying by no more than 2%.

### Population by Age

Blaenau Gwent, like the majority of places in the UK, has an overall population which is ageing. Generally, this is because less people are being born than before, and those people that are alive are living longer. The information below shows key trends in population by three distinct age groups (0-15, 16-64, and 65 and over):

- 17.5% of the population of Blaenau Gwent were aged 0-15 years in 2015, a slightly lower proportion than the 17.9% seen for Wales.
- The proportion of the people aged 0-15 is decreasing (2011, 17.9%).
- 63.1% of the population were aged 16-64 years in Blaenau Gwent in 2015, which was the highest proportion of all the local authority areas in the Gwent region and above the Wales rate which was 61.9%
- The proportion of people aged 16-64 is decreasing (2011, 64.2%)
- 19.5% of the population were aged 65 years or over in the (Blaenau Gwent) Gwent region on 30 June 2015. This compares with 20.2% for Wales.
- The proportion of people aged 65 and over is increasing although is below the Welsh average (2011, 17.9%).

Figure 61: Components of Population Change (2001-2016)

	2001- 2002	2002- 2005	2003- 2004	2004- 2005	2005- 2006	2006- 2007	2007- 2008	2008- 2009	2009- 2010	2010- 2011	2011- 2012	2012- 2013	2013- 2014	2014- 2015	2015- 2016
Natural Change	-262	-203	-198	-110	-21	-123	26	-8	34	-47	-18	-8	60	-48	-57
Net internal Migration	-359	-109	132	-17	252	-5	-67	-162	-206	-120	19	-103	-214	-96	66
Net external migration	-5	-14	-21	-35	66	76	46	26	-45	18	-15	46	45	59	70

Source: Components of population change, by local authority and component Stats Wales

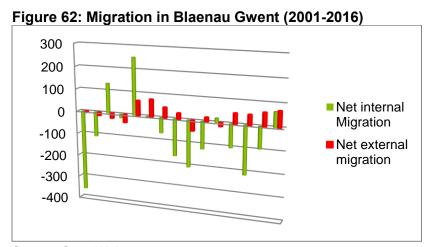
#### Natural Change

Natural change is the difference between births and deaths. In the period 2001-2007 deaths far exceeded births and as a result there were net losses in the hundreds. Since 2007 there has been a marked improvement with figures being positive for three years and with losses not exceeding 57 in others. This has been due to a general increase in births and a decline in deaths.

#### Migration

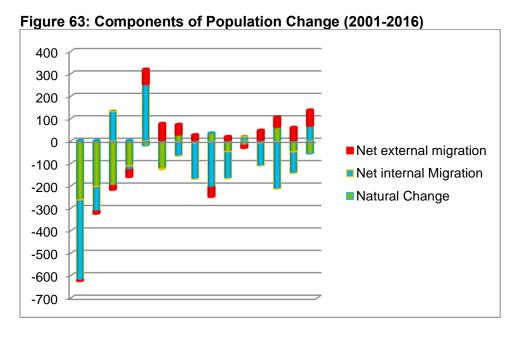
Net internal migration has fluctuated from a high loss of 359 in 2001-2002 to a gain of 252 in 2006-2007 then a loss – peaking in 2009-2010 followed by a general recovery. Internal migration figures have generally been between one and two thousand.

Net external migration has played a lesser role with losses increasing from -5 in 2001 to -35 in 2005. This has been followed by a period of gains with the exception of 2011-2012. The figures are generally in the tens and hundreds rather than thousands.



Source: Stats Wales

Figure 63 below identifies that from 2001 to 2007 natural change played a significant part in population loss. However, the biggest contributor to change is net internal migration with losses of 100-300 on a number of occasions. The overall trend has changed from large net losses (over 600 a year) to increases of 100 a year. The population of Blaenau Gwent appears to be stabilising.



Source: StatsWales

#### Disability

Statistics from the Annual Population Survey (June 2016) shows that Blaenau Gwent continues to have significantly above average levels of disability with a total of 31.6% of working age people being defined as disabled (economically active core or work limiting disabled) compared to 22.8% for Wales.

These comparatively high levels of disability in Blaenau Gwent leads to a high proportion of people claiming disability related benefits, with 12.0% of working aged people in Blaenau Gwent claiming EAS or Incapacity Benefit, compared to 8.4% across Wales (May 2016).

### Religion and Belief

The 2011 Census showed that half of the people in Blaenau Gwent stated their religion to be a Christian (50%), below the welsh average of 59%. This has shown a notable decrease since the 2001 Census, with respective levels of 64% and 71%. Just over 1% of people in Blaenau Gwent stated that they were of another religion such as Buddhist, Hindu, Muslim, Jewish and Sikh. Just over 41% of the Blaenau Gwent population stated they have no religion, above the welsh average of 37%. This is a notable increase compared to 2001, with respective levels of 25% and 19%. A further 8% of people in Blaenau Gwent did not state their religion.

#### **Evolution of the baseline without the RLDP**

The sustained negative population growth in Blaenau Gwent evident since the 1920s has slowed significantly over recent census cycles which, if trended forwards, could indicate that the population will stabilise and potentially return to positive growth in future. Notable recent localised population decreases in the south of the plan area, particularly at Six Bells and Abertillery, may be partially addressed by the increased connectivity the area will have once the rail spur to Abertillery to be delivered as part of the SE Wales Metro is operational. The Heads of the Valleys, particularly Nantyglo, has seen the highest proportion of recent population growth and this may indicate the market will continue to find the area most attractive for delivery of new housing in the future.

The aging population will likely continue to increase in the short to medium term. This could mean that certain services and facilities, such as social care, will come under increasing pressure over time. Future development in the County Borough could offer potential to help address current and future specialist needs in the context of an aging population and high relative levels of reported disabilities. Trends for in-migration are likely to remain low in the context of limited change to the housing and employment offer in the County Borough.

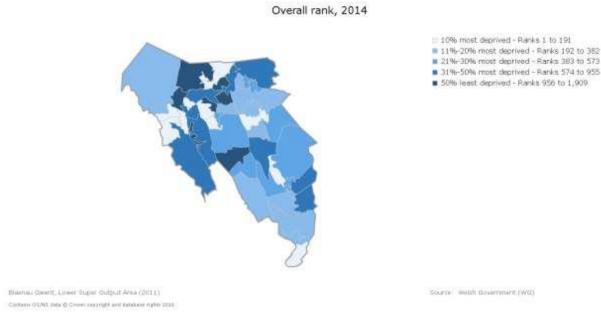
### 5.0 A Wales of Cohesive Communities

# **Multiple Deprivation**

Figure 64 below shows the rank of the 2014 Welsh Index of Multiple Deprivation (WIMD) which captures the extent of deprivation relating to a number of factors and focuses on the proportion of residents in each lower super output area (LSOA) and their level of deprivation.

The overall index provides a single figure that represents the combination of the eight domains of deprivation within the WIMD. The eight domains are: income; employment; health; education; skills and training; geographical access to services; housing; physical environment; and community safety. The darker areas of the map represent those areas with a higher percentage of the population in deprivation.

Figure 64: Blaenau Gwent Welsh Index of Multiple Deprivation 2014



Source: Welsh Government

Blaenau Gwent is the area in Wales with the highest percentage of LSOAs in the most deprived 10% (23.4%). When considering the individual domains for the area, Blaenau Gwent had the highest percentage of LSOAs in the most deprived 10% in Wales, for income (19.1%), education (27.7%), and community safety (23.4%).

# Housing

There are 32,367 dwellings in Blaenau Gwent. 4.8% (Census 2011) are vacant, which is above the welsh average of 4%, but this has decreased since 2001, where it stood at 6% (Census 2001).

Figure 65: Household Tenure 2011

Household Tenure	Blaenau Gwent	Wales
Owner occupied households	62.1%	67.7%
Own outright	32.9%	35.4%
Owns with mortgage or loan	29.1%	32.0%
Shared ownership	0.1%	0.3%
Rented Households	36.8%	30.6%

Social Rented	24.0%	16.5%
Private Rented	12.8%	14.1%

Source: Census 2011

At the time of the 2011 census, 62.1% of households in Blaenau Gwent were living in owner occupied accommodation which is largely unchanged since 2001 and is less than Wales. The percentage of rented households in Blaenau Gwent is higher than that of Wales,. The marked difference is the higher percentage of social rented households in Blaenau Gwent than Wales, 24.0% and 16.5% respectively. Blaenau Gwent transferred its stock of council accommodation to Tai Calon in 2010. The number of people renting from a private landlord has risen significantly from 6.1% in 2001 to 12.8% in 2011.

A large percentage of dwellings are terraced properties (average 52%) though there is considerable variation across the area – for example, 74% in Abertillery compared with 21.5% in Rassau.

Figure 66: Household Type

Household Type	Blaenau Gwent	Wales
Detached house / bungalow	11.0%	27.7%
Semi-detached house / bungalow	26.7%	31.0%
Terraced house (including end terrace)	52.2%	27.8%
Purpose built flats/tenement	8.0%	9.6%
Converted/shared house	0.9%	2.4%
Flat in commercial building	1.2%	1.0%
Caravans/mobile home etc	0.1%	0.4%

Source: Census 2011

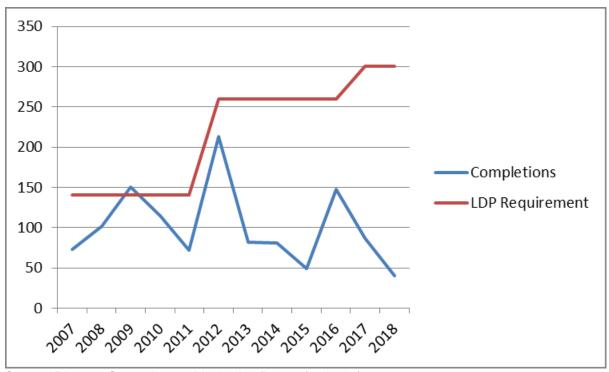
The average household size has remained at 2.3 as shown in the 2001 and 2011 Census. This is also true of the average number of rooms per household which was 5.14 (2001) and 5.2 (2011). The average household size is similar to that of the Welsh average. However, the average number of rooms is slightly less than the Welsh average.

In 2017, 83.3% of housing in Blaenau Gwent is within council tax bands A and B, which is an increase of 0.96% since 2000. 0.206% of housing in Blaenau Gwent is within council tax bands G & H. This suggests that the overall size and quality of housing stock in the County Borough is relatively modest, particularly in the regional context.

### Housing Completions

House building completions in Blaenau Gwent have been erratic since 2006 due in part to a greater reliance on completions from the social sector where schemes tend to be completed at one point. 2018 saw the lowest completion figure so far. Overall completions have been much lower than expected due to a distinct shortage of national builders operating in Blaenau Gwent. At present there is only one national builder operating in Blaenau Gwent and that is Davies Homes, at Bedwellty Gardens in Tredegar. The contribution from small sites to completions increased to 18 in 2018 but this is still the third lowest figure recorded. Overall completions were below the 140 per annum expected by the LDP for the period between 2006-2011, fell well below the 260 expected between 2011 and 2016; and are well below the 300 expected between 2017-2021 (see Figure 67 below).

Figure 67: Housing Completions for Blaenau Gwent 2006-2018

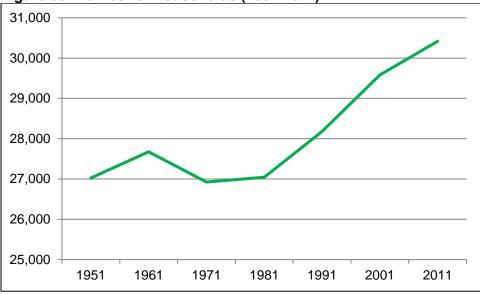


Source: Blaenau Gwent Annual Monitoring Report (2017-18)

# Number of Households

Since 1981 the number of households has increased from 27,000 to over 30,000 though population levels have fallen from over 75,000 to under 70,000 (see Figure 57). This can be explained by a decrease in the average household size.

Figure 68: Number of Households (1951-2011)



Source: "A Vision of Britain through time"

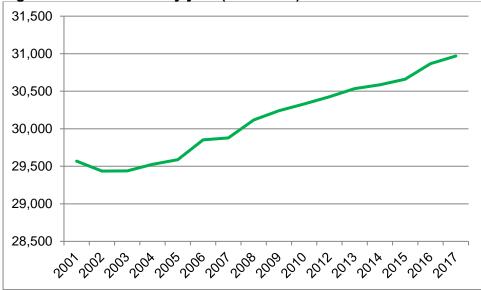
More recently the number of households has increased steadily since 2007 with increases of over 200 per annum in 2008 and 2016.

Figure 69: Households by year

Ī	01	02	02	04	OF	06	07	00	00	10	10	12	11	15	16	17
ļ	UI	02	03	04	05	06	07	08	09	10	12	13	14	15	16	17
	Change	-133	3	88	62	264	24	240	123	91	95	109	50	75	207	102

Source: StatsWales

Figure 70: Households by year (2001-2017)



Source Stats Wales

Figure 71 below shows how the household size has decreased between 2001 and 2017. This downward trend is expected to level though current Welsh Government projections predicts that this downward trend will continue to fall at this rate and will reach 2.138 by 2033.

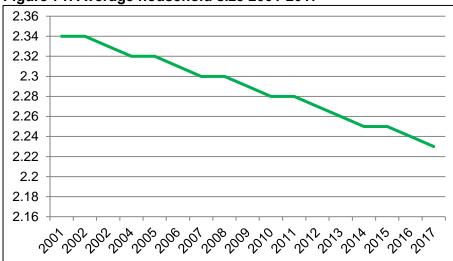


Figure 71: Average household size 2001-2017

Source: StatsWales

The Welsh Government's 2008 based projections anticipate an additional 84,000 households being formed across South East Wales by 2021, this represents a 14% growth over the household level at 2011. In Blaenau Gwent the projections indicate an additional 2,668 households over the same period, a growth of 8%.

Welsh Governments 2014 based projections suggest a totally different story with the 2008 projected figure not being met. Instead they identify that there will only be a 1% level of growth achieved between 2011 and 2021 and that by 2031, there will be only a 0.5% growth in households. The reality lies somewhere between these two projections.

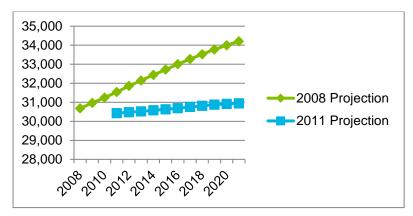


Figure 72: Welsh Government Household Projections

Source: StatsWales

Housing Land Availability

Figure 73: Housing Land Availability

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
8.9	7.9	7.6	7.6	3.3	2.57	2.01	1.35	1.28

Source: Blaenau Gwent Housing Land Availability Study

There is a requirement under TAN 1, Joint Housing Land Availability Studies, that Local Authorities maintain a 5 year land supply. The Figure above shows that since the adoption of the Plan Blaenau Gwent has failed to have a 5-year supply of land.

#### Condition of Housing Stock

The 2011 Census did not collect data in relation to the quality of housing stock (fit for habitation). In terms of the Welsh Housing Quality Standard, Figure 74 below sets out the number of Registered Social Landlord (RSL) properties that are WHQS compliant.

Figure 74: Condition of Registered Social Landlord Properties

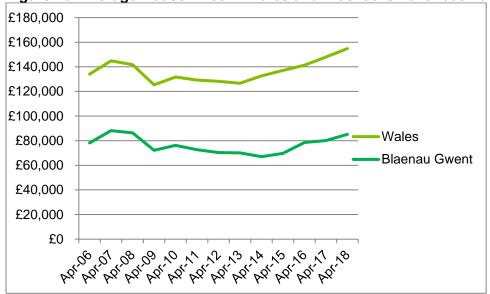
Registered Social Landlord	Number of Properties	% WHQS Compliant
United Welsh	980	99.7%
Melin	364	100%
Linc Cymru	585	100%
Tai Calon	6,099	100%

Source: Blaenau Gwent Annual Monitoring Report 2017-18

### Affordability

According to the Land Registry, in April 2018 the average house price in Wales was £154,835 whereas the average house price in Blaenau Gwent was £85,128. As can be seen from Figure 75, house prices in Blaenau Gwent are well below the Wales average. Blaenau Gwent house prices have failed to rise in line with Wales and so the gap between Blaenau Gwent and Wales increased to its widest yet (£69,707). This disparity in house price is partly a reflection of the lack of new homes being built as new houses normally command higher prices.

Figure 75: Average House Price in Wales and Blaenau Gwent 2006-2018



Source: Blaenau Gwent Annual Monitoring Report 2017-18

Figure 76 illustrates the average price of different types of property in the surrounding regions. The average property prices relate to June 2017, whilst the percentage sales figures relate to the period January 2017 to December 2017. Monmouthshire has the second highest average house price and in 2017, the largest proportion of property sales were accounted for by detached houses.

	Detached	Semi- detached	Terraced	Flat/Maisonette	Overall
Monmouthshire Av £	358,216	201,180	190,425	149,378	273,523
% Sales	47.9	24.4	20.4	7.3	
Torfaen Av £	242,158	143,417	107,514	76,239	155,146

% Sales	28.5	25.9	42	3.6	
Newport Av £	291,609	169,661	131,717	101,357	179,125
% Sales	24	28	33.9	14.1	
Powys Av £	259,871	161,618	133,722	125,596	206,076
% Sales	53.1	23	21.6	2.4	
Blaenau Gwent Av £	190,482	115,333	74,561	58,913	99,273
% Sales	14.1	19.2	64.7	2.1	

Figure 76: Average property prices

Source: Hometrack

#### Affordability

Figure 77 below shows the affordability of housing in Blaenau Gwent compared to surrounding authorities in both Wales and England. That is the property price as a multiple of the annual income of the resident population. Blaenau Gwent is the most affordable of the areas.

12 10 8 4 2 Elicus Justin Globestershire korest of Dean

Figure 77: Ratio of house prices to income (lower quartile) July 2017/June 2018

Source: Hometrack

### Energy efficiency

Blaenau Gwent ranks second in Wales for households that have central heating (99.2% up from 97% in 2001).

In 2014, 535 megawatt hours of domestic gas and electricity were consumed in Blaenau Gwent. This figure has decreased by 17 since 2013. Blaenau Gwent households have consistently used less energy than the Wales average since records began in 2010, though it is important to think about whether this is linked to fuel poverty.

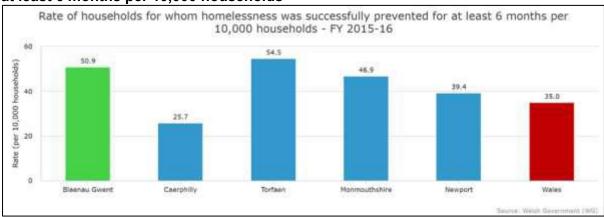
## Gypsy and traveller accommodation

There are currently 20 Local Authority authorised gypsy and traveller pitches with a further 4 on a private gypsy and traveller site. Local Authorities have a duty to undertake gypsy and traveller accommodation assessments under the Housing (Wales) Act 2014. The latest assessment for Blaenau Gwent (2015) identified the need for a further 12 pitches up to 2021.

#### Homelessness

Blaenau Gwent has above the Wales average for the number of homeless people decided to be eligible and in priority rate (4.77 compared to 3.89). It is also the highest in Wales for the number of households assessed as threatened with homelessness within 56 days (86.7 per 10,000 households, compared with the Wales average of 53.7). However, in 2015/16, the rate of households for whom homelessness was successfully prevented (for at least 6 months per 10,000 households) was 51%. This is high compared to other local authorities in the region, where the lowest was 26%. The Wales average for the same period is 35%.

Figure 78: Rate of households for whom homelessness was successfully prevented for at least 6 months per 10,000 households



Source: Welsh Government

### **Crime**

The Blaenau Gwent Well-being Assessment covers crime in Blaenau Gwent (2016) and identifies that total crime in Blaenau Gwent has increased by 6% over the calendar year period of 2016. The 4,895 offences account for 12.5% of all crime in Gwent and translate to a crime rate of 70.96 crimes per 1000 population which remains above Gwent's average (68.33).

Blaenau-Gwent saw a significant reduction in antisocial behaviour (ASB) incidents during 2016 i.e. - 15% or 546 fewer incidents. The 3,181 incidents account for 14% of all ASB incidents in Gwent and translate to a rate of 45.58 per 1000 population which remains above Gwent's average (38.65).

The figure below shows a breakdown of crime by the areas within Blaenau Gwent.

Figure 79: Crime Levels by Area

Area	Jan-15 to Dec-15	Jan-16 to Dec-16	Daily Avg (Prev)	Daily Avg (Latest)	Rate per 1,000	Year End Diff	% Chg from Last Year	Pop Est	Proportion
B/Gwent	4613	4895	12.6	13.4	70.140	282	6.1%	69,789	
Abertillery	952	1037	2.6	2.8	63.596	85	8.9%	16,306	21.2%
Brynmawr	1004	1174	2.8	3.2	79.009	107	16.9%	14,859	24.0%
Ebbw Vale	1553	1677	4.3	4.6	71.746	124	8.0%	23,374	34.3%
Tredegar	1104	1007	3.0	2.8	66.033	-97	-8.8%	15,250	20.6%

Source: Blaenau Gwent Well-being Assessment

With the exception of Tredegar who experienced a 9% reduction, all other areas saw increases, in particular Brynmawr saw a 17% increase. In terms of Crimes per 1000 population, Brynmawr (79) and Ebbw Vale (72) are now the highest areas and impact upon Blaenau Gwent's overall rate of 71. At ward level, the areas that had most impact upon Brynmawr's significant increase were Blaina (+28%) and Nantyglo (+19%). In both areas, there were significant increases in Criminal Damage & Arson, Violence and Acquisitive crime offences.

The table below shows total crime in Blaenau Gwent split by crime type. Priority crimes in terms of volume remain as criminal damage and arson and violent offences.

Figure 80: Crime by Offence Group

Area	Jan 15 –	Jan 16 -	Rate per	Year End	%	Pop Est	Proportion
	Dec 15	Dec 16	1,000	Difference	Change from last year		
Criminal damage and arson	1058	1097	15.719	39	3.7%	69,789	22.4%
Violence without injury	628	845	12.108	217	34.6%	69,789	17.3%
Violence with injury	524	550	7.881	26	5.0%	69,789	11.2%
All other theft	525	517	7.408	-8	-1.5%	69,789	10.6%
Vehicle crime	454	464	6.649	10	2.2%	69,789	9.5%
Burglary – non dwelling	316	342	4.900	26	8.2%	69,789	7.0%
Shoplifting	287	270	3.869	-17	-5.9%	69,789	5.5%
Public order offences	206	230	3.296	24	11.7%	69,789	4.7%
Burglary – dwelling	193	196	6.444	3	1.6%	30,416	4.0%
Drug offences	168	100	1.433	-68	-40.5%	69,789	2.0%
Misc crimes against society	95	100	1.433	5	5.3%	69,789	2.0%
Other sexual offences	68	81	1.161	13	19.1%	69,789	1.7%
Rape	35	24	0.344	-11	-31.4%	69,789	0.5%
Possession of weapons	12	24	0.344	12	100.0%	69,789	0.5%
Bicycle theft	17	20	0.287	3	17.6%	69,789	0.4%
Theft from the person	17	14	0.201	-3	-17.6%	69,789	0.3%
Robbery	10	11	0.158	1	10.0%	69,789	0.2%
Homicide	0	0	0.000	0	0.0%	69,789	0.0%

Source: Blaenau Gwent Well-being Assessment

Crimes that have seen a notable increase over the year are violence without injury (+217 crimes, +35%) and other sexual offences (+13 crimes, +19%). Other notable increases, albeit small numbers were in possession of weapons having doubled (from 12 to 24), and bicycle theft (from 17 to 20).

# **Accessibility**

#### Road

Figure 81: Road Length by Road Class 2017/18 (KM)

Location	Motorway	Trunk	County	B & C road	Minor surfaced
Blaenau Gwent	0	9.6	45.2	66.6	389.7
Monmouthshire	21.5	101.8	58.7	610.1	839
Newport	25.2	8.8	51.3	189.1	414.8
Torfaen	0	14	26.3	101.6	314
Powys	0	430.6	238.2	2,706.1	2,126.8
Wales	133	1,576.3	2,762.9	12,854.3	17,085

Source: StatsWales

The area's principal road system provides A-road access to the motorway network (the M4, M5 and M50) and combined with the A470 and A465 Heads of the Valley roads, connects the area with the South East, South West, Midlands and London. Online improvements between the peripheral distributor road and the A465; and the dualling of the A465 Heads of the Valleys Road Tredegar to Brynmawr have been complete. Construction is currently underway for section 2 of the Heads of the Valleys dualling improvements to A465 Gilwern to Brynmawr.

#### Volume of Traffic

Figure 82: Volume of Traffic (Million Vehicle Kilometres)

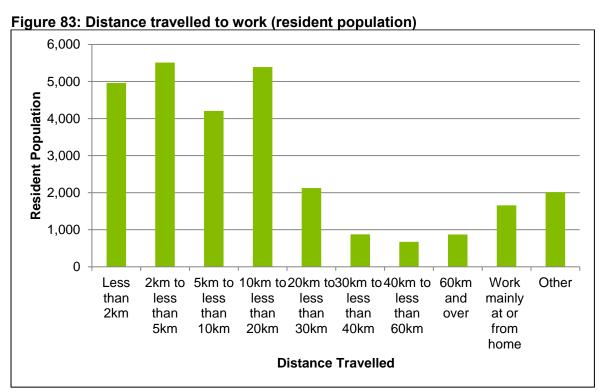
9	2010	2011	2012	2013	2014	2015	2016	2017	+/- %
Blaenau Gwent	392	397	395	396	400	425	435	411	+4.8
Newport	1,747	1,787	1,762	1,767	1,861	1,904	1,941	1,949	+11.6
Torfaen	604	603	593	581	609	618	634	615	+1.8
Powys	1,462	1,453	1,432	1,459	1,506	1,540	1,596	1,609	+10
S E Wales	12,595	12,663	12,642	12,663	13,145	13,388	13,667	13,451	+6.8
Wales	26,977	26,931	26,762	26,999	27,894	28,396	29,170	29,084	+7.7

Source: Department of Transport (Welsh Transport Statistics 2011)

The net volume of traffic since 2010 has increased throughout Wales, where the largest increase in the period was seen in Newport. In 2017, the South East Wales area accounted for 46% of the volume of traffic in Wales. There has been an increase in traffic volume of 4.8% since 2010 in Blaenau Gwent which could reflect the road improvements to the area.

#### Travel to Work

In terms of travel distances to work, the majority of the population travel less than 10 km commuting distance. This is typical of Wales as a whole.

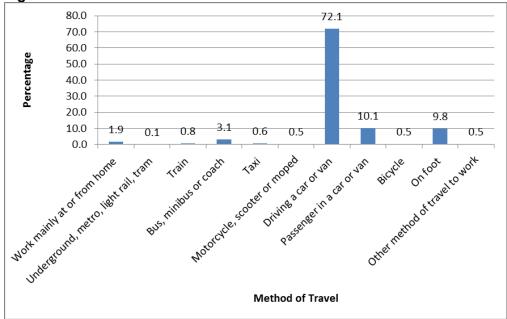


Source: Census 2011

#### Mode of Travel

72.1% of the County Borough's population (Census 2011) relies on the private car for their work journey, with only 9.8% of the population walking and 0.5% cycling to work.

Figure 84: Method of Travel to Work



Source: Census 2011

In terms of car ownership there has been an increase in the total number of vehicles owned by households in Blaenau Gwent since 2001. In particular there are now more households owning 2 cars or vans than in 2001, an increase of 4.6%. The number of households without a car remains higher than Wales but has fallen from 35.1% in 2001 to 28.9% in 2011.

# Bus

The following list identifies the main bus services that currently operate within Blaenau Gwent:

Service	Route and Timings	Operator
X4	Cardiff-Merthyr-Tredegar-Ebbw Vale-Brynmawr-Abergavenny-Herford (2 hourly to Hereford every 30mins at busy times and hourly throughout the rest of the day to Abergavenny)	Stagecoach
X15	Brynmawr-Abertillery-Newport (every 30 mins at busy times and hourly service for the rest of the day)	Stagecoach
E2	Ebbw Vale-Hilltop (circular every 30mins)	Stagecoach
E3	Brynmawr-Abertillery-Ebbw Vale-Garnlydan (hourly service)	Stagecoach
E4	Ebbw Vale-Garnlydan (every 30 mins)	Stagecoach
E11	Tredegar Peacehaven-Ebbw Vale (hourly service)	Harris Coaches
E12	Tredegar-Dukestown (hourly)	Harris Coaches
E14	Tredegar-Gwent Way (hourly service)	Harris Coaches
4	Tredegar – Cefn Golau-Rhymney – Pontlottyn and Ystrad Ysbyty Fawr (hourly service)	Harris & Stagecoach
20	Tredegar – Waundeg-Rhymney Station (30 mins at busy times otherwise hourly service)	Harris Coaches
52	Abertillery-Newbridge-Blackwood (every hourly service)	Stagecoach

56	Tredegar-Blackwood-Newport (30 mins at busy times otherwise hourly)	Stagecoach	
3/S	Abergavenny-Gilwern-Brynmawr (4 services a day)	Stagecoach	
1	Abertillery-Cwmtillery-Brynithel-Hillcrest-Abertillery (hourly service)	Henleys Bus Service	
3	Abertillery-Arael View (every 30 mins)	Henleys Bus Service	
X1	Brynmawr-Abertillery-Pontypool-Cwmbran (hourly)	Phil Anslow	
31	Brynmawr to Forgeside (hourly)	Phil Anslow	

During weekdays and on Saturdays, the current frequency of bus services between hubs varies between 2 and 4 per hour which is considered a limited service. Sunday service also remains limited. A further issue identified in the Well-being plan engagement related to the lack of bus routes to the main employment areas in Blaenau Gwent.

### Rail

The Ebbw Vale Parkway railway opened in February 2008 and provides an hourly service to Cardiff from Ebbw Vale. Intermediate stations are Ebbw Vale Parkway, Llanhilleth, Newbridge, Crosskeys, Risca, Pontymister, Rogerstone and Pye Corner. A dedicated feeder bus service links the Abertillery town centre from Llanhilleth. Actual passenger numbers greatly exceed forecasts. In 2002, passenger journeys were forecast at 22,000 per month. Whereas by 2008, 44,000 journeys had been made on the service each month; also exceeding the monthly target of 33,000 set for 2012. Plans are underway to increase the service to two trains per hour.

In May 2015, the Ebbw Vale town station extension opened in May 2015 and provided an extension from the existing terminus at Ebbw Vale Parkway to the new station at the Ebbw Vale town. Ebbw Vale town railway station serves the town centre of Ebbw Vale.

These stations offer good interchange opportunities with local bus services. The X4 and E3 bus routes connect the railway stations in Ebbw Vale with the settlements of Tredegar, Brynmawr, Nantyglo and Blaina and Abertillery.

### **Airport**

The nearest airports to Blaenau Gwent are Cardiff International, Bristol and Birmingham. Locals are largely reliant on private transport or taxi services to access the airports. However access to the Cardiff airport can be achieved via public transport through the rail link from Ebbw Vale to Cardiff Central and the Cardiff airbus.

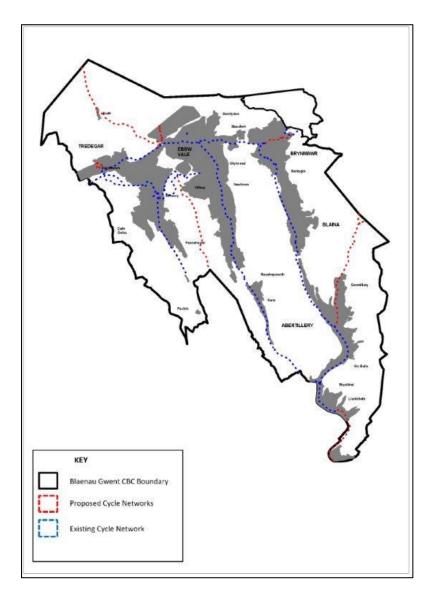
# Public Rights of Way

The total length of public rights of way network in Blaenau Gwent is 301,392 metres. In 2017-18, 80.9% of this network is available to the general public to use, which equates to 243,805 metres. Some of the areas of the public rights of way have been temporarily closed due to the heads of the valleys road construction works.

# Cycle Routes

Figure 85 below shows the existing cycle networks within Blaenau Gwent and those that are proposed. The Blaenau Gwent Annual Monitoring Report (2017-18) identifies that the percentage of the population within 1km of the cycle network is 96%.

# Figure 85: Existing and Proposed Cycle Networks



Source: Blaenau Gwent County Borough Council

## **Evolution of the baseline without the RLDP**

The sustained under-delivery of housing in relation to the adopted LDP target suggests that a significant increase in housing delivery into the future is unlikely. Sustained under-delivery over time has implications for a range of issues, including challenges in ensuring the provision of a mix of types and tenures of housing, provision of new and enhanced community infrastructure and capacity to address causes of deprivation. In this context, the potential for continued low growth within the plan area is likely to mean that the baseline position of Blaenau Gwent in respect of these issues is unlikely to be significantly altered into the future.

Car dependency is high in absolute terms in the County Borough, though is consistent with other similar plan areas. It is considered that this is unlikely to be significantly affected by future development. Growth offers theoretical potential to increase rates of walking and cycling through the introduction of new and enhanced walking and cycling connectivity, though in the context of low housing growth there may be limited opportunities to seek such green infrastructure delivery at a strategic scale. Public transport connectivity and accessibility will be significantly boosted once the SE Wales Metro programme delivers a new station at Abertillery.

# 6.0 A Wales of Vibrant Culture & Thriving Welsh Language

# **Cultural Heritage**

# Welsh Language

Figure 86 below shows the percentage of people aged 3 years and over who could speak Welsh. In 2011, the percentage of people aged 3 years and over who could speak Welsh in the Gwent region was 9.9%, compared to 19.0% for Wales. Blaenau Gwent had the lowest percentage of its population aged 3 years and over who could speak Welsh at 7.8% across the Gwent region. This means that only 5,000 people in the area can speak Welsh.

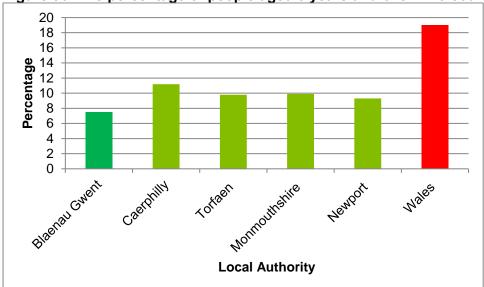


Figure 86: The percentage of people aged 3 years and over who could speak Welsh

Source: Census 2011

As well as having low levels of welsh speakers, information suggests that those that do consider themselves to be able to speak Welsh still do not use the language on a regular basis. The Annual Population Survey shows that in Blaenau Gwent only 2% of people aged 16 years or over speak Welsh daily, compared to 10% for Wales overall.

In Blaenau Gwent there was a small percentage increase of people aged 3 years and over who could speak Welsh between the 2001 Census and the 2011 Census 1.7%. This pattern was witnessed across Wales overall. However, the people who can speak Welsh have risen significantly since 1991 when just 2.2% of the population or around 1,500 of people were Welsh speaking.

The rise in the number of people who speak Welsh between 1991 and 2011 can be directly correlated to the change in national education policy in Wales where teaching of Welsh language to key stage 4 was made compulsory in all English medium schooling in Wales from 1999. As a consequence it is not surprising that children and young people account for the highest number of Welsh speakers in Blaenau Gwent, a pattern which is mirrored across Wales.

The Census 2011 shows that although there are higher levels of Welsh language ability in those aged 0-15 (31% are able to speak Welsh), only 5% of people aged 16-64 are able to speak Welsh and 1% of people aged 65 and over are able to speak Welsh.

Consideration of Welsh Language Speakers by neighbourhood areas show that Blaenau Gwent does not have any distinctive pockets of Welsh language speakers, with levels being generally consistent across the area.

When considering by small geographical areas (MSOAs), the highest number of welsh language speakers was Nantyglo and Blaina (8.6%) and the area with the lowest number of Welsh language speakers was central Ebbw Vale (7%).

There is one welsh medium primary school in Blaenau Gwent, namely: Ysgol Bro Helyg, Blaina. There are no welsh secondary schools. The closest welsh secondary school is Ysgol Gyfun Gwynllyw which is located in the adjoining authority of Torfaen.

## **Ethnic Diversity**

The 2011 Census statistics showed Blaenau Gwent's Black and Ethnic Minority population to be just under 1,900. This equates to 2.6% of the total population and well below the Welsh average of 6.7%. In 2001, the percentage of people in Blaenau Gwent from minority ethnic groups was 1.8%, approximately 1,300 people which shows a notable increase from 2001 to 2011. Even so, Blaenau Gwent still has one of the lowest levels of people from minority ethnic groups in England and Wales.

#### **Historic Environment**

Many of Blaenau Gwent's important buildings, archaeological remains and open spaces are protected in order to preserve their special character.

#### Conservation Areas

Blaenau Gwent has one conservation areas located in Tredegar. The boundary of the conservation area in Bedwellty House and Park has been extended to include the southern end of Tredegar town centre including The Circle and Castle Street.

#### Historic Parks and Gardens

Cadw, in association with the International Council on Monuments and Sites and the former Countryside Council for Wales, has prepared a Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. The register has been prepared in two parts. The first part covering historic parks and gardens lists Bedwellty Park. Tredegar. The designation is given to parks and gardens for their historic interest, contents and features, condition, and historical associations. They are graded on a similar grading system to listed buildings and Bedwellty Park is evaluated as Grade II.

#### Historic Landscape

In Wales, the most important and best surviving historic landscapes have been identified on the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. The register identifies two types of historic landscape:

- · Outstanding historic landscape areas; and
- Special historic landscape areas.

Part 2.1 of the Register of landscapes of outstanding historic interest in Wales lists Blaenavon and Coity Mountain, part of which falls within the Blaenau Gwent planning administrative area.

### Scheduled Ancient Monuments

There are 13 archaeology sites statutorily protected as Scheduled Ancient Monuments under the Scheduled Ancient Monuments and Archaeological Areas Act 1979 within the Blaenau Gwent administrative area.

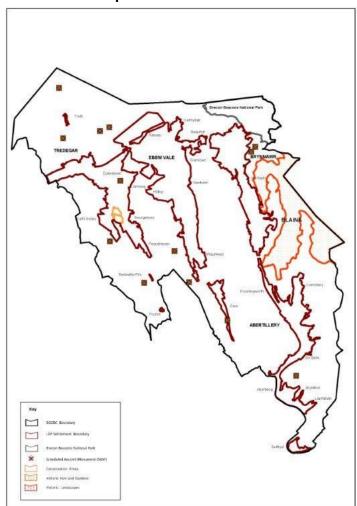


Figure 87: Location and Designation of Sites, Areas and Buildings of Historic or Conservation Importance

Source: Blaenau Gwent County Borough Council Listed Buildings

Under the provisions of the Planning (Listed Building and Conservation Areas) Act 1990, the Secretary of State for Wales is required to produce a list of buildings of special architectural or historic interest for the guidance of local planning authorities. This responsibility is undertaken by Cadw. Buildings and structures are classified in grades (I, II\* and II) to indicate their relative importance. All listed buildings and structures are awarded the same level of protection regardless of their grading.

There are 53 Listed Buildings in Blaenau Gwent all of which are Grade II or Grade II\*. In terms of the listed buildings at risk, the number has decreased from 10 to 9, as the Ebbw Vale Education Centre is no longer at risk.

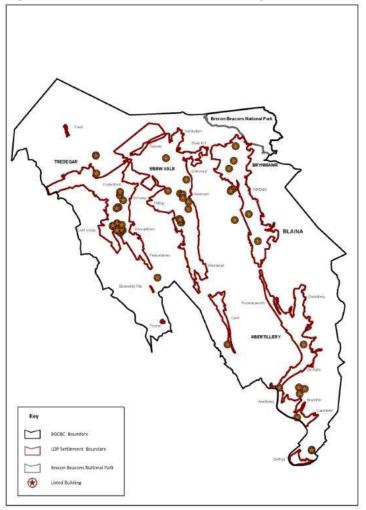


Figure 88: Location of Listed Buildings within Blaenau Gwent

Source: Blaenau Gwent County Borough Council

### Non- designated Historic Assets

There are 1,048 non designated historic assets in Blaenau Gwent. (source: Glamorgan Gwent HER).

## Landscape

## Woodland

Wales is one of the least wooded countries in Europe – 14% coverage compared to EU average of 37% (Woodland Trust 2011). However, Blaenau Gwent is one of the most wooded counties in Wales, accounting for 22.5% of land use. This is shown in the figure below and includes small areas of broadleaf woodland and upland conifer woodland which are both close to communities.

In the Area, 590 hectares of the Welsh Government's Woodland Estate (WGWE) is managed by Natural Resources Wales. This is approximately 5% of the land area. These are publically owned forests.

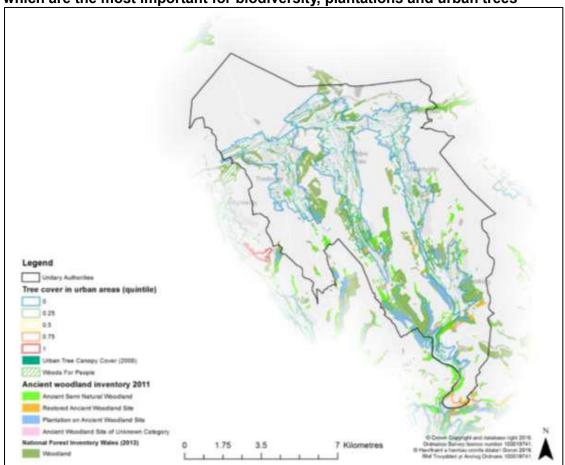


Figure 89: Extent of woodland cover in Blaenau Gwent including ancient woodlands, which are the most important for biodiversity, plantations and urban trees

Source: Blaenau Gwent Well-being Assessment

#### Special Landscape Areas

The first LDP identified 8 Special Landscape Areas (SLAs). The purpose of the SLA designation was to identify those landscapes which are of particularly high intrinsic value and which require special protection for their own sake as part of the County's landscape resource. The areas identified are:

- St Illtyd Plateau and Ebbw Eastern Sides
- Eastern Ridge and Mynydd James
- Cwm Tyleri and Cwm Celyn
- Mynydd Carn y Cefn and Cefn yr Arail
- Mynydd Bedwellty, Rhymney Hill and Sirhowy Sides
- Cefn Manmoel
- · Trefil and Garnlydan Surrounds
- Beaufort Common

These SLAs within Blaenau Gwent cover a total area of approximately 7,614 hectares, accounting for approximately 70% of the total local planning area within Blaenau Gwent area.

#### **Evolution of the baseline without the RLDP**

New development within Blaenau Gwent has the potential to impact built and cultural heritage assets and their settings through inappropriate design and layout. The County Borough has a wide range of built and cultural heritage and this range of historic contexts presents potential for a variety of negative effects from inappropriate development.

Equally, however, new development will offer opportunities for enhancing the quality of the County Borough's historic environment, either through regeneration of a specific asset or through improvements to an asset's setting and wider environment. Development can also offer opportunities to improve access to or better reveal the significance of a heritage asset.

Similarly, development could have potential for effects in relation to Blaenau Gwent's distinctive and attractive landscapes, including its eight Special Landscape Areas (SLAs). New development could have potential to lead to incremental changes in landscape and townscape quality in and around the County Borough, particularly if located on greenfield sites at the edges of the existing built area. However, existing development management policies will likely continue to provide mitigation against inappropriate or harmful design and layout.

Future development is unlikely to lead to significant effects in relation to the existing low rates of Welsh language proficiency in Blaenau Gwent, though there is no specific cause to think that Welsh Language use will fall as a result of future development.

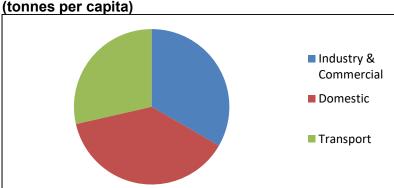
## 7.0 A Globally Responsible Wales

#### **Climatic Factors**

#### **Greenhouse Gas Emissions**

Emissions of CO2 in Blaenau Gwent

Figure 90: Carbon Dioxide Emissions per Capita, by sector in Blaenau Gwent, 2011



Source: 2005-2015 UK Local and Regional CO<sub>2</sub> Emissions Dataset (Department of Energy and Climate Change (DECC))

The figure above shows that most carbon emissions in Blaenau Gwent were produced by domestic properties (38%) with transport accounting for approximately 28% and industry and commercial for approximately 33%.

#### Carbon and Ecological Footprint

Local authorities with the lowest carbon footprint tend to be those with the lowest overall environmental burden per capita i.e. the valleys and more densely populated areas in South Wales (Source: 2015 Ecological and Carbon Footprints of Wales – Update to 2010, Stockholm Environment Institute and GHD).

Figure 91 shows the carbon footprint per person across the Gwent region for 2011, measured in tonnes of carbon dioxide equivalent per person. This ranged from 10.64 tonnes per person in Caerphilly and Blaenau Gwent to 11.50 tonnes per person in Monmouthshire. This compared with 11.10 tonnes per person for Wales

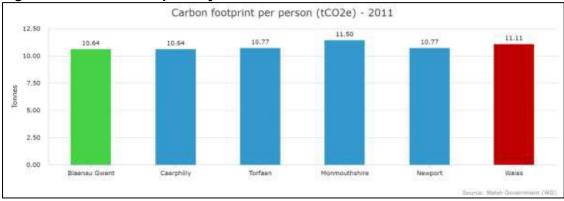


Figure 91: Carbon Footprint by Area

Source: Welsh Government

The ecological footprint is an indicator of the total environmental burden that society places on the planet. It represents the area of land needed to provide raw materials, energy and food, as well as absorb pollution and waste created. It is measured in global hectares. The ecological footprint for a particular population is defined as "the total area of productive land and water ecosystems required to produce the resources that the population consumes and assimilate the wastes that production produces, wherever on Earth that land and water may be located". The consumption of food, housing, transport, consumer items, private services and public services together accounts for 85% of the ecological footprint.

Figure 92 shows the ecological footprint per person across the Gwent region for 2011. This ranged from 3.10 global hectares per person in Blaenau Gwent to 3.42 global hectares per person in Monmouthshire. This compares with 3.30 global hectares per person for Wales.

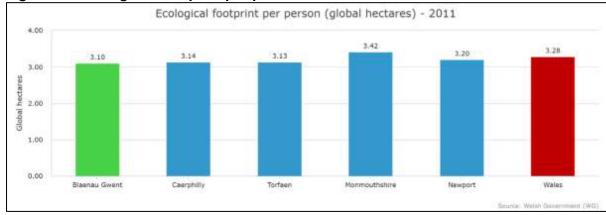


Figure 92: Ecological Footprint per person

Source: Welsh Government

The data shows that Blaenau Gwent is starting from a good position as it has the lowest carbon and ecological footprint of the area's that have had comparable data shown and is also below the whole of Wales average. It could also be interpreted that Blaenau Gwent is one of the most deprived and given that the fact that the data shows that there may be a higher number of people in fuel and monetary poverty that cannot afford a standard of living that the other areas, and Wales in general, can. It also shows that Monmouthshire being considered quite an affluent area has the highest carbon an ecological footprint which reinforces the notion that Blaenau Gwent's low score in both areas could be linked to poverty.

Renewable and Low Carbon Energy Production

Figure 93 below shows that 15.208 MW of renewable energy developments have been installed in the form of wind turbines and photovoltaic solar panels.

Figure 93: Capacity of renewable energy developments installed

Name of scheme	Technology	Capacity (Mw)	Capacity (GWh)	Status	Source
Photovoltaic (Household)	Solar	1.7	1.47	Grant Supported	Ofgem
Photovoltaic (Commercial)	Solar	0.157	0.135	Grant supported	Ofgem
Photovoltaic (Industrial)	Solar	0.15	0.129	Grant Supported	Ofgem
Hafod y Dafol Farm, Cwm	Solar	10.0	8.75	Operational	BGCBC
Unit 15 Rassau Industrial Estate	Wind Onshore	0.75	1.77	Operational	BGCBC
The Grouse Farm	Wind Onshore	0.001	0.00236	Operational	BGCBC
Unit 29 Tafarnaubach Industrial Estate	Wind Onshore	0.5	1.18	Operational	BGCBC
Penrhiwgwaith Farm, Hollybush	Wind Onshore	0.5	1.18	Operational	BGCBC
Blaentillery Farm, Cwmtillery	Wind Onshore	0.45	1.064	Operational	BGCBC
Coed y Gilfach, Six Bells	Wind Onshore	0.5	1.18	Operational	BGCBC
Eurocaps Ltd Crown Business Park	Wind Onshore	0.5	1.18	Operational	BGCBC
		15.208	18.040	-	-
	Total				

Source: Council planning records and Ofgem (August 2018)

Since 2013, 2.79 MW of low carbon energy developments have been installed at the Works Energy Centre in the form of combined heat and power and biomass boiler.

Figure 94: Capacity of low carbon energy developments installed per annum

Scheme	Location	Capacity					
2013-2014	2013-2014						
Combined heat and power	The Works Energy Centre	0.39 MW					
2014-2015							
Biomass Boiler	The Works Energy Centre	2.4 MW					
2015-2016							
No low carbon energy develo	pments installed						
2016-2017							
No low carbon energy developments installed							
2017-2018							
No low carbon energy developments installed							
	Total (2013-2017)	2.79 MW					

Source: Blaenau Gwent Annual Monitoring Report 2017-18

#### Flood Risk

Technical Advice Note (TAN) 15 published by the Welsh Government categories areas of the floodplain within Wales. Figure 95 below identifies the areas of floodplain within Blaenau Gwent. Zone B relates to areas that have flooded in the past, evidenced by sedimentary deposits. The flood zone B areas are

predominantly in Cwm, Ebbw Vale and Tredegar where there historic river courses and waterways. Zone C1 identifies areas of the floodplain that are developed and served by significant infrastructure including flood defences. These are located in Cwm, Aberbeeg and Llanhilleth. Zone C2 identifies areas of the floodplain without significant flood defence infrastructure. TAN 15 states that only less vulnerable development should be considered within these areas. These areas tend to follow the existing rivers and watercourses in each of the valleys.

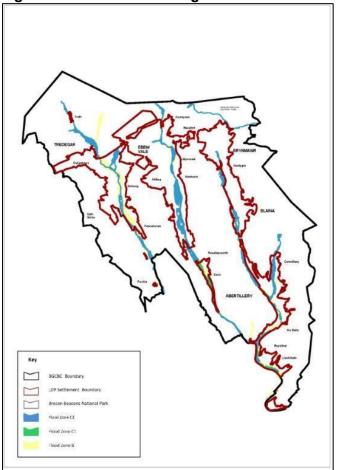


Figure 95: Areas of Flooding within Blaenau Gwent, with and without flood defences

Source: NRW Development Advice Maps

## Surface Water Flooding

A need to identify areas at risk from surface water flooding was introduced in response to the Flood Risk Regulations (2009). The first stage was to prepare a Preliminary Flood Risk Assessment in order to establish the level of flood risk within each Lead Local Flood Risk Authority (LLFA). The process looked specifically at flooding from surface water, ground water and ordinary water courses and the interface with flooding from main rivers.

In order to have consistency of approach DEFRA and WG identified a number of key risk indicators and their thresholds to establish significant risk and to determine the existence of indicative Flood Risk Areas.

The methodology was based on using the flood maps produced by NRW to identify 1 km squares where flood risk exceeds a defined threshold. These squares are known as areas above Flood Risk Threshold (Blue Squares). The key flood risk indicators and their thresholds for a 1 km square were set as follows:-

- 1. A minimum of 200 people
- 2. A minimum of 20 businesses
- 3. 2 or more critical services

NRW identified 29 blue squares within BGCBC.

A cluster of blue squares is an indication that an area of concentrated flood risk has been identified. Where there are four or more touching blue squares within a 3km x 3km square the whole 3km x 3km square was considered as an area which could form part of an indicative Flood Risk Area.

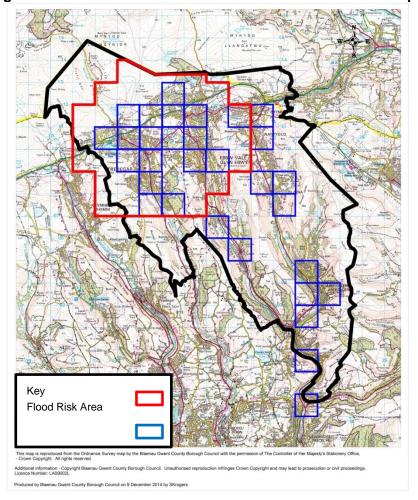


Figure 96: BGCBC - Ebbw Vale Flood Risk Area and Blue Squares

The key flood risk indicator for establishing an indicative Flood Risk Area was set as – numbers of people at risk of being affected by flooding exceeding 5,000.

Based on the methodology defined above, NRW defined an indicative Flood Risk Area within BGCBC of 40.38 Km<sup>2</sup> based on the 17 blue squares in the Ebbw Vale / Tredegar area.

The review carried out by BGCBC on past and future flooding did not justify any amendments to the Indicative Flood Risk Area identified by NRW.

The key Flood Risk Indicators for BGCBC were calculated by NRW as follows:

Figure 97: Risk Counts for Blaenau Gwent Flood Risk Area (based on new Flood Hazard Mane)

waps)	СО	OUNTS FOR I	FLOOD RISK ARE	Ą		
			Total in defined area		Risk Count	s
				HIGH	MEDIUM	LOW

COUNTS FOR FLOOD RISK AREA					
	Total in defined area		Risk Counts	5	
		HIGH	MEDIUM	LOW	
Risk to people					
Number of people in area:	40,089	682	696	2,825	
Number of Services:	57	4	1	6	
Risk to economic activity					
Number of non-residential properties:	2,785	119	84	351	
Number of Airports (n)	0	0	0	0	
Length of Primary/Trunk Roads (km)	68	3	1	3	
Length of railway (km):	1	0	0	0	
Area of Agricultural Land – Grades 1, 2 and 3 within the area (ha)	0	0	0	0	
Risk to Natural and Historic Environment					
New Local FILE (1) with the will in FO				0	
Number of EU Bathing Waters within 50m:	5	4	0	0	
Number of Environmental Permitting Regulations (EPR) Installations within 50m:	5	4	U	٥	
Area of Special Areas of Conservation (SAC) within area (ha):	0	0	0	0	
Area of Special Protection Areas within area (SPA) (ha)	0	0	0	0	
Area of Ramsar Sites within area (ha):	0	0	0	0	
Areas of World Heritage Sites within area (ha):	0	0	0	0	
Area of Sites of Special Scientific Interest (SSSI) within area (ha):	4,069	0	0	0	
Areas of designated Parks and Gardens within area (ha):	10	0	0	2	
Area of Scheduled Ancient Monuments within area (ha):	3	0	0	0	
Number of Listed Buildings within area :	36	2	2	5	
Number of Licensed Abstractions (LA) within area:	13	0	0	2	

Source: Blaenau Gwent Flood Risk Management Plan

There are 40,089 people and 57 services in Blaenau Gwent Flood Risk Area. Of these, 682 people and 4 services are considered to be at high risk with a 1 in 30 (3%) or greater chance of flooding in any given year. A further 696 are in medium risk with a 1 in 100 (1%) chance of flooding in any given year. A further 2,825 people are considered to be at low risk with a 1 in 1000 (0.1%) chance of flooding in any given year.

Out of the 2,785 non-residential properties in the Flood Risk Area, 119 have a high risk with a 1 in 30 (3%) chance of flooding in any given year. A further 84 have a 1 in 100 (1%) chance of flooding in any given year, with 351 considered to have a low risk with a 1 in 1000 (0.1%) chance of flooding occurring each year. Seven kms of the primary/trunk road network are also at risk of flooding.

There are 5 environmental permitting installations within the Flood Risk Area 4 of which are considered to be at high risk with a 1 in 30 (3%) chance of occurring each year. Two of the 36 Listed Buildings in the Blaenau Gwent Flood Risk Area are at a 1 in 30 (3%) or greater chance of flooding each year; with a further 2 of these considered to be at medium risk 1 in 100 and a further 5 a low risk 1 in 1000 of flooding.

As a result of having an area of significant flooding Blaenau Gwent was required to prepare a Flood Risk Management Plan. The Flood Risk Management Plan sets out measures and objectives to manage flood risk from 2015 to 2021 and beyond. In light of Climate Change without intervention flood risk is likely to increase in the longer term.

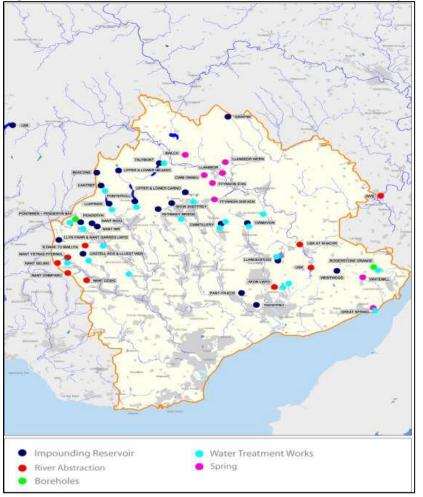


Figure 98: Water Resources in the South East Wales Conjunctive Use System

Source: Blaenau Gwent Well-being Assessment

Blaenau Gwent's water supply is primarily from the three small reservoirs - Shon Sheffery and Upper & Lower Carno. As the SEWCUS WRZ is an integrated network, supplies from abstractions from the Rivers Wye and Usk can be transferred to relieve the demand on the smaller upland impounding reservoirs in Blaenau Gwent whose storage declines relatively quickly in dry weather. This preserves the storage in the smaller sources and allows them to supply their immediate demand areas through an extended drought.

Making water available to Blaenau Gwent, to overcome any deficit, the water is abstracted and pumped from the River Usk/Wye. This uses a lot of energy and is not wholly sustainable over the long-term. As a result this issue needs to be addressed.

To safeguard supply, water companies in England & Wales have a statutory duty (as set out in in Section 37A-37D of the Water Industry Act 1991) to produce a water resources management plan (WRMP) every five years. The plan must set out how a water company intends to maintain the balance between supply and demand for water over a 25 year period, while protecting the environment.

A WRMP is complemented by a water company drought plan, which sets out the short-term operational steps they will take as a drought progresses to enhance available supplies, manage customer demand and minimise environmental impacts.

The WRMP's annual average planning scenario remains in surplus throughout the current planning period until 2039 as shown in Figure 99 below.

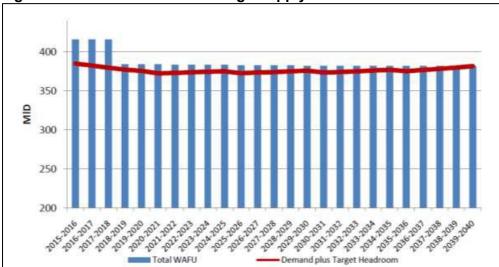


Figure 99: SEWCUS Annual Average Supply Demand Balance Position 2015-2040

N.B. There is a reduction in Total Water Available for Use (WAFU) in 2018 due to changes to abstraction licences brought about by the Habitats Directive.

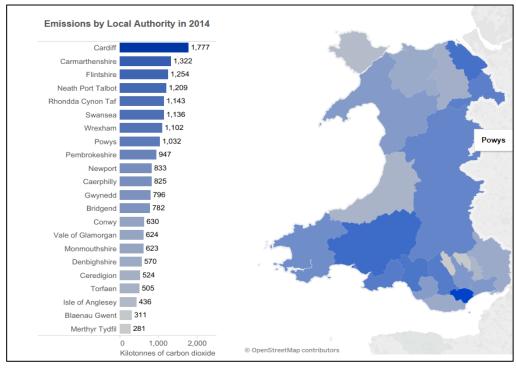
Source: Dwr Cymru Welsh Water, 2014

#### Climatic Factors

Both natural and human factors affect global climate. Natural causes can include interactions between the ocean and the atmosphere, changes in the Earth orbit and volcanic eruptions. Humans influence global climate by releasing greenhouse gases (for example carbon dioxide and methane) into the atmosphere. These gases absorb energy that is radiated from the Earths surface, warming the atmosphere and increasing temperatures globally. The intergovernmental Panel on Climate Change (IPCC) concluded in 2007 that most of the observed increase in global average temperatures since the mid-20<sup>th</sup> century is very likely to be due to the observed increase in man made greenhouse gas concentrations. Average annual temperatures have increased by 1.71°C in the UK since 1659. Summers have become hotter and drier whilst winters are milder and wetter. Climate change can be reduced by mitigation; by reducing the net emissions of greenhouse gases, notably CO<sub>2</sub>. However, some impacts can be tackled through adaptation.

#### Emissions of CO<sub>2</sub>



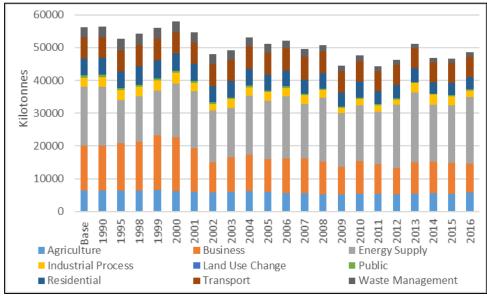


Source:

#### Welsh Government Statistics and Research

The Figure above shows how carbon dioxide emissions vary across Wales, as expected, the most emissions in 2014 were recorded in Cardiff, and in more built up areas in general. Blaenau Gwent has the second lowest emissions in Wales.

Figure 101: Emissions of CO<sub>2</sub> in Wales



Source: Stats

Wales

Figure 101 indicates that emissions of CO<sub>2</sub> vary on a year by year basis although the sources are generally consistent. Total GHG emissions from Wales have reduced between by 12% between 1990 to 2013, whilst carbon dioxide emissions have fallen by 14% between the base year and 2016. These

emission reductions are a result of a decline in manufacturing emissions (e.g. in iron and steel, bulk chemical production) in the Business and Industrial Process sectors, efficiencies in energy generation and business sector heating, the use of natural gas to replace some coal and other fuels as well as abatement in some chemical industries. Residential sector emissions and Transport emissions have not reduced markedly since the Base Year due to increasing population and increasing demand for heating and transportation despite improvements in energy efficiency of vehicles and housing. No local or regional comparator data is however available and is therefore considered to be a data gap.

#### Energy

There is no data relating specifically to emissions from energy within Blaenau Gwent. However Figure 102 below outlines the main Greenhouse Gas emissions in 2016 for Wales. Emissions in 2016 are 47,787 ktCO2e with 43% of emissions in 2016 from Energy Supply, 19% from Business, 13% from Transport, 12% from Agriculture, and 8% for Residential Sources.

Figure 102: Emissions Summary for Wales, 2016 (kt CO₂e)

Sector Name	Emission	Percentage of total GWP Weighted Emissions
Agriculture	5,728.64	12.0
Business	8,896.24	18.6
Energy Supply	20,288.47	42.5
Industrial Process	2,009.74	4.2
Land Use Change	-773.08	-1.6
Public	337.60	0.7
Residential	3,730.04	7.8
Transport	6,312.05	13.2
Waste Management	1,257.93	2.6
Total	47,787.63	100.0

Source: AEA Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland: 1990-2016

## **Evolution of the baseline without the RLDP**

New development could have potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. Widespread implementation of SuDS could help reduce the risk from surface water run off, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding where possible. In the long term, climate change could increase the potential for flood events through changing rainfall patterns.

Per capita emissions in Blaenau Gwent are likely to decrease over time as energy efficiency measures, renewable energy production and new technologies become more widely adopted. This includes potential for reduced emissions from transport, as increased take up of more energy efficient vehicles and electric vehicles takes place.

# Appendix III: Appraisal of Strategic Options

## Introduction

Each of the strategic options identified in Chapter 5 were subject to a comparative appraisal under each ISA theme and the detailed findings are presented in this Appendix.

## Method

For each of the strategic options, the assessment examines **likely significant effects** on the baseline, drawing on the sustainability objectives and themes identified through scoping (see Table 3.1 in the main report) as a methodological framework

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

It is important to note that effects are predicted taking into account the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Blaenau Gwent County Borough Council).

Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2.

# Appraisal of options for the level of growth

The Council commissioned Edge Analytics to prepare population, household and economic projections. To date 10 different scenarios have been prepared each with different outcomes in terms of population, dwellings and demographics. These have been grouped into three options of low, medium and high growth for the RLDP period (2018-2033). For each option a figure is given for the increase in the population, the number of new homes and the impact on the number of people in the workforce.

Growth option	Level of housing and employment
Option 1 - Low growth (based on WG latest 2014 projections principal and 10 yr migration)	Population: loss of between 857 to 1,815 (-0.8% to 2.6% loss)  Housing: 19 - 54 per annum (Total: 285 - 810)  Employment: loss of 94 to 59 per annum (Total loss of 810 to 1,410 jobs)
Option 2 - Medium growth (based on 3 dwelling led projections (5,10 & 15 yr average) and Net nil migration)	Population: 162 to 690 gain (0.2 to 1% growth)  Housing: 79 - 94 per annum (Total 1,185 - 1,410)  Employment: loss of 52 to 36 per annum (Total loss of between 540 to 780 jobs)
Option 3 - High growth (based on PopGroup short term, long term, and long term adjusted)	Population: 1,996 to 5,009 gain (2.9% to 7.2% growth)  Housing: 141 - 226 per annum (Total 2,115 - 3,390)  Employment: -3 to 74 per annum (Total -45 to 1,110 jobs)

#### ISA Theme: Economy and employment

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	3	2	1
Significant effect?	Yes - Negative	No	Yes - Positive

Options 1 and 2 would both result in a loss of jobs in the County Borough during the RLDP plan period. Option 3 is the only one that could potentially result in the delivery of new jobs during the plan period. It is therefore assumed Option 3 has a greater potential to encourage a diverse and vibrant economy by ensuring a sufficient range of employment sites that are of an appropriate size and type to meet the needs of the County Borough and the wider area. However, it is also recognised that there are other ways of increasing employment such as increasing the economic activity rate, reducing unemployment and the commuting ratio. The higher levels of growth are also more likely to support the aspirations and opportunities associated with the Cardiff Capital Region City Deal, SE Wales Metro and the improvements to the Heads of the Valley trunk road. Furthermore, a higher level of residential growth is also more likely to support existing town centres and existing areas of employment; however, this is uncertain at this stage as the location of growth is not known.

## Discussio

n

While Options 1 and 2 are both predicted to result in a loss of jobs during the plan period it is considered that Option 1 is more likely to have a significant negative effect against this ISA as it could also result in not enough new homes to meet identified needs. This coupled with the potential loss in jobs is more likely to have residual significant negative effects for the economy and employment.

Taking the above into account the higher growth options, in particular Option 3, perform better against the economy and employment theme. Option 3 is also predicted to be the only option that will result in a residual long term significant effect. Option 1 has the potential for a significant negative effect as it would result in a loss of jobs and not enough new homes to meet identified needs.

#### ISA Theme: Population and communities

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	3	2	1
Significant effect?	Uncertain	Yes - Positive	Yes - Positive

The Housing Supply Background Paper states that currently (January 2020) there is approximately 680 dwellings already committed (completed or with planning permission) and a windfall/ small site allowance of 602 dwellings during the plan period (2018-2033). This leaves a residual requirement of 473 dwellings to meet the housing requirement during the plan period. This means that Option 1 may not deliver enough new homes to meet the identified needs of the County Borough during the life of the plan and therefore has the potential for a significant negative effect depending on the final level of growth. It is assumed that as the level of growth increases, so does the likelihood that the higher growth options will be able to deliver a greater range/ mix of new homes to help meet the needs of all residents. A higher level of residential development would also support the growth aspirations of the County Borough and the wider region, taking advantage of infrastructure improvements, such as the dualling of the Heads of the Valley Trunk Road and proposed extension of the Ebbw Vale railway line to Abertillery. It could also be assumed that the higher levels of growth would be able to deliver greater improvements to the public realm and community infrastructure; however, this is uncertain at this stage and dependent on a variety of factors, including the location and scale of sites to deliver the additional arowth.

Discussio

Taking the above into account it is considered that as the level of growth increases so does the likelihood for a residual long term positive effect of significance. Options 2 and 3 would provide a greater range of new homes to meet the predicted increased population and affordable housing needs, they are therefore more likely to have a residual significant long term positive effect. Option 1 is less likely to have a residual significant positive effect, at maximum delivery it could only provide a small number of additional homes over that which is already committed and anticipated as windfall during the plan period. It is therefore less likely to deliver a diverse range of new homes or address the significant affordable housing need in the County Borough.

#### ISA Theme: Health and wellbeing

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	2	1	1
Significant effect?	Uncertain	Uncertain	Uncertain

Blaenau Gwent has the lowest percentages of residents assessing their general health as very good health and good health when compared to all other local authorities. This is reflective of residents' lifestyles as Blaenau Gwent has the higher proportion of smokers and e cigarette users than compared to national figures. In terms of obesity levels, Blaenau Gwent has a higher percentage when compared to the Aneurin Bevan Health Board and Wales as a whole. Blaenau Gwent had the highest proportion of LSOAs in the most deprived 50% in Wales for the health domain. Most of Blaenau Gwent's residents have good access to natural green space.

## Discussio

Given the high-level nature of the options and uncertainties at this stage, it is difficult to highlight any significant differences between the options. It could be suggested that as the level of growth increases so does the potential for a greater loss of green/ public open space; however, this is dependant on the location of development. Furthermore, the higher levels of growth could increase pressure on existing health services. Conversely, it could be argued that the higher levels of growth could be more likely to deliver new areas of good quality and accessible public open/ green space and recreational areas as well as be more likely to deliver improvements to health services.

It is assumed that as the level of growth increases so does the likelihood that access to new homes and jobs will be improved for communities with indirect long term positive effects on health and wellbeing. Taking the above into account, Option 1 is considered to perform less well against this theme compared to Options 2 and 3 as it could only deliver a small level of additional growth over and above existing commitments during the plan period. It is difficult to identify any significant differences between Options 2 and 3 at this stage given uncertainties, so residual effects are uncertain.

#### ISA Theme: Equalities, diversity and social inclusion

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	3	2	1
Significant effect?	No	No	Yes - Positive

At this stage the location of growth is not known, as a result it is difficult to determine how specific communities and protected characteristics are likely to be affected by the options. As indicated through the appraisal under other themes, increased levels of growth provide an opportunity to deliver a greater mix of housing and employment to meet the needs of all members of the community. There is also the potential to deliver greater improvements to community infrastructure and the public realm, but this is uncertain at this stage. In this context, a higher level of growth could help to address areas of deprivation depending on where it is located. Furthermore, a higher level of growth could also be more likely to meet the needs of people across a wider area of the County Borough; however, again this would be dependent on the preferred spatial strategy. It could be argued that a lower level of growth could help to protect the identity of existing communities, but this will also be dependent on where development is located and how it is designed/implemented.

#### Discussio n

Taking the above into account, the options proposing a higher level of growth are considered to perform more positively against this ISA theme as they provide an opportunity to deliver more homes, jobs and community infrastructure. This is likely to have long term positive effects for communities and protected groups. Option 3 is considered more likely to have a residual long term significant positive effect compared to Options 1 and 2 given the level of growth proposed.

#### ISA Theme: Transport and movement

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	=	=	
Significant effect?	No	No	No

The Housing Topic Paper states that currently (September 2019) there is approximately 680 dwellings already committed (completed or with planning permission) and a windfall/small site allowance of 602 dwellings during the plan period (2018-2033). This leaves a residual requirement of 473 dwellings to meet the housing requirement during the plan period.

The small level of additional growth proposed under Option 1 is unlikely to have a significant effect in terms of congestion on the existing highways network. While the additional development proposed under Options 2 and 3 has the potential to increase traffic; the nature and significance of the effects will be dependent on where the development is located as well as the infrastructure improvements that could be provided. If the additional residential development is located close to the main settlements, taking advantage of the services/ facilities and employment opportunities on offer, and main bus routes and train stations then there is the potential to encourage the use of sustainable transport and therefore encourage a modal shift. There is also the opportunity to take advantage of infrastructure improvements such as the dualling of the Heads of the Valley trunk road and proposed extension to the Ebbw Vale railway line to Abertillery. If additional growth is located away from the main settlements, bus routes and train stations then this is likely to exacerbate the current trend of private vehicle use and increase traffic on the highways network.

Discussio

At this stage, there is no evidence to suggest that the higher levels of growth would have a significant negative effect on the highway network. While higher levels of growth could deliver new transport infrastructure, given the level of growth this is unlikely to be significant. As a result, it is considered that there are no significant differences between the options at this stage and none are predicted to have a significant effect. The nature and significance of effects will ultimately be dependent on the precise location and implementation of development.

#### ISA Theme: Natural resources (air, land, minerals and water)

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	1	2	3
Significant effect?	No	Uncertain	Uncertain

As the level of growth increases so does the likelihood for negative impacts on natural resources through the potential loss of greenfield/ agricultural land and mineral resources; reduced air quality as a result of increased traffic; and increased demand for water resources.

The majority of agricultural land within Blaenau Gwent is Grade 4 and 5, which is identified as poor quality and very poor quality agricultural land respectively. The County Borough does not have any best and most versatile agricultural land (Grades 1, 2 or 3a).

The County Borough Council lies on the north eastern edge of the South Wales coalfield with Coal Measures underlying the majority of the area, which has a legacy of deep and open cast coal mining. The coal bearing rocks are overlain in the south of the County Borough by Pennant Sandstone, predominantly the Hughes and Grovesend Beds. The properties of the Pennant Sandstone in Blaenau Gwent make it suitable for use as High Specification Aggregate (HSA) as well as general aggregate and building stone. The availability of such materials is limited to relatively few locations in England and Wales and is therefore a nationally important resource. There is an outcrop of Carboniferous Limestone on the edge of the coalfield in the north of the County Borough.

The loss of agricultural land and mineral resources is uncertain at this stage as it will be dependent on the precise location of development and if the land is greenfield or brownfield. Despite this, options that propose a lower level of growth are considered to perform better against this theme as they will require less land take. Evidence suggests that there is approximately 680 dwellings already committed during the plan period (2018-2033). This means that Option 1 could only result in a maximum of 130 additional dwellings; Option 2 has the potential to deliver from 505 to 730 additional dwellings and Option 3 has the potential to deliver from 1,435 to 2,710 additional dwellings over the 680 dwellings committed during the plan period. Options 2 and 3 are predicted to have an uncertain effect against this theme at this stage as the precise location of development is not known. If development is primarily delivered on greenfield/agricultural land and important mineral resources then a residual negative effect is likely, with the significance of this effect increasing as the level of growth increases. If the majority of growth can be delivered on brownfield land then there is the potential for a positive effect. Given the small level of additional growth that would occur under Option 1 it is not considered likely to have a significant effect.

Discussio n

Air quality across Blaenau Gwent currently remains below statutory limits/ national objectives. No significant differences were identified between the options under the transport ISA theme. While higher levels of growth are likely to increase traffic they also provide an opportunity to deliver new infrastructure and encourage a modal shift. The nature and significance of effects are uncertain at this stage and dependent on the implementation of appropriate mitigation measures.

Water is supplied to Blaenau Gwent by the Dwr Cymru/Welsh Water (DCWW). They supply water via a large scale, multi-source, integrated network that is typical of many other water company areas. This Water Resource Zone (WRZ) is known as the South East Wales Conjunctive Use System (SEWCUS). In total, there are over 40 resources that are used to supply the SEWCUS WRZ, which include a mixture of river abstractions from the larger rivers in the east of the WRZ and relatively small upland reservoir sources with small catchment areas.

Water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every 5 years to take account of predicted growth and ensure that there are schemes in place to meet future demands. As the scale of growth proposed under the options increases so does the pressure on water resources. However, given the legal requirements in place for WRMPs, it is considered that there are no significant differences between the options in terms of effects on water resources. It is expected that development coming forward under any of the options can

#### ISA Theme: Natural resources (air, land, minerals and water)

deliver mitigation (for example rain water harvesting measures) to support reduced water use per person per day.

Of thirteen waterbodies in the County Borough there are nine classed as having 'moderate' status, two 'poor' status and two 'good' status under the Water Framework Directive. There is a phosphorous issue on the River Clydach which is being addressed by Dwr Cymru/ Welsh Water with the upgrading of the waste water treatment works at Brynmawr.

Options proposing a higher level of growth would place increased pressure on sewerage infrastructure; however, currently there are no identified capacity issues. The increased growth could have impacts on water quality through increased impermeable surfaces and transfer of pollutants, but it is considered that there is suitable mitigation available at a development control level to ensure that residual effects are not significant. Taking the above into account, it is considered that there are no significant differences between the options at this stage in terms of the water environment.

#### ISA Theme: Biodiversity and geodiversity

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	=	=	II
Significant effect?	No	No	No

In terms of biodiversity and geodiversity the impacts will ultimately be dependent on the precise location of development. There are no European sites (Special Areas of Conservation (SAC), Special Protections Areas (SPA) or Ramsar sites) within the County Borough. However, there are European sites in neighbouring authorities including the Usk Bat Sites SAC and Cwm Clydach Woodlands SAC. In terms of nationally designated biodiversity sites, there is one that falls wholly within and two partially within the County Borough. Cwm Merddog Woodlands Site of Special Scientific Interest (SSSI) falls wholly within the County Borough and is situated to the south of Ebbw Vale. Brynmawr sections SSSI and Mynydd Llangynidr SSSI are partially located within the County Borough in the north. In terms of local designations, there are 155 Sites of Importance for Nature Conservation (SINCs) and 12 Local Nature Reserves (LNRs) designated within the County Borough.

#### Discussio n

It is assumed that none of the options would result in the loss of any international, national or locally designated sites. The Housing Topic Paper states that there is approximately 680 dwellings already committed (completed or with planning permission) and a windfall/ small site allowance of 602 dwellings during the plan period (2018-2033). This leaves a residual requirement of 473 dwellings to meet the housing requirement during the plan period. The additional growth proposed under Options 2 and 3 are likely to require more land take and therefore result in wider habitat loss and fragmentation as well as increased disturbance (recreation, noise and light) compared to Option 1. Conversely, the higher levels of growth could offer greater opportunities for delivering biodiversity net gain; however, this is uncertain at this stage as the location of development is not known.

At this stage it is not possible to identify any significant differences between the options or conclude that they are likely to have a significant effect on biodiversity and geodiversity. The nature and significance of effects will ultimately be dependent on the precise location of development and sensitivity of receptors.

#### ISA Theme: Historic environment

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	=	=	•
Significant effect?	No	No	No

In terms of the historic environment the impacts will ultimately be dependent on the precise location and design of development. Blaenau Gwent has two conservation areas that are both located in Tredegar. These are Bedwellty Park Conservation Area and Garden and the Southern Town Conservation Area. Bedwellty Park and Garden is the only Registered Historic Park and Garden in Blaenau Gwent that features in the Cadw Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. There are 13 Scheduled Monuments within the County Borough and these are primarily located in the west and north. There are 53 listed buildings spread across Blaenau Gwent.

It is assumed that none of the options would result in the loss of any designated heritage assets. The Housing Topic Paper states that there is approximately 680 dwellings already committed (completed or with planning permission) and a windfall/ small site allowance of 602 dwellings during the plan period (2018-2033). This leaves a residual requirement of 473 dwellings to meet the housing requirement during the plan period.

#### Discussio n

The additional growth proposed under Options 2 and 3 are likely to require more land take and therefore result in wider impacts on the historic environment across the County Borough compared to Option 1. If this additional growth is located close to or within the setting of designated heritage assets then there could be the potential for negative effects; however, this is uncertain at this stage as the location of this additional development is not known. The higher levels of growth could offer more opportunities to improve access to designated heritage assets or help to redevelop brownfield areas that are currently detracting from the historic environment, but again this is uncertain at this stage.

At this stage it is not possible to identify any significant differences between the options or conclude that they are likely to have significant effects on the historic environment. None of the options are likely to have a significant effect on the Welsh language.

#### ISA Theme: Landscape

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	=	=	=
Significant effect?	No	No	No

As for a number of other ISA themes, the nature and significance of effects on landscape/
townscape impacts will ultimately be dependent on the precise location and design of
development. Blaenau Gwent has a rich and diverse landscape bordering the Brecon Beacons
National Park, and the Blaenavon Industrial Landscape World Heritage Site. Special Landscape
Areas within Blaenau Gwent that are designated in the currently adopted LDP cover a total area
of approximately 7,614 hectares, accounting for approximately 70% of the total local planning
area within Blaenau Gwent area.

The Housing Topic Paper states that there is approximately 680 dwellings already committed (completed or with planning permission) and a windfall/ small site allowance of 602 dwellings during the plan period (2018-2033). This leaves a residual requirement of 473 dwellings to meet the housing requirement during the plan period.

# Discussio

The additional growth proposed under Options 2 and 3 are likely to require more land take and therefore result in wider impacts on the landscape across the County Borough compared to Option 1. If the majority of this additional growth is delivered on brownfield land then there is the potential for positive effects on the landscape/ townscape through the regeneration of previously developed land if sensitively designed. If the majority of additional growth is delivered on greenfield land on the edge of existing settlements then there is the potential for negative effects; however, it is likely that suitable mitigation is available to reduce the significance of any residual effects. Delivery of this additional growth in the more rural areas is more likely to result in a residual significant negative effect but is dependent on the sensitivity of the landscape and scale and design/ layout of development.

At this stage it is not possible to identify any significant differences between the options or conclude that they are likely to have significant effects on landscape.

#### ISA Theme: Climate change

Options	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
Rank	1	2	3
Significant effect?	No	No	No

In terms of climate change mitigation, a higher level of growth will ultimately lead to increased levels of greenhouse gas (GHG) emissions. There is nothing to suggest that the higher levels of growth could provide a unique opportunity to help reduce per capita GHG emissions. Furthermore, there is no evidence to suggest that the additional growth proposed under Options 2 and 3 could potentially provide a unique opportunity for the delivery of new low carbon or renewable energy. It is therefore assumed that development proposed under any of the options has the potential to incorporate renewable or low carbon energy.

## Discussio

In terms of climate change adaptation, it is assumed that the additional growth proposed under Options 2 and 3 would be directed to areas of lower flood risk as per the sequential test. It is also assumed that there is suitable mitigation available to ensure that the additional development does not increase flood risk, for example through the delivery of sustainable drainage systems.

Taking the above into account, it is considered that the Options proposing a lower level of growth perform more positively against the climate change theme. There is no evidence to suggest that any of the options are likely to have a significant effect.

#### Summary findings and conclusions for growth level options

	Rank/	Categorisation and rank		
ISA Themes	significant effect	Option 1 - Low growth	Option 2 - Medium growth	Option 3 - High growth
	Rank	3	2	1
Economy and Employment	Significant effect?	Yes - Negative	No	Yes - Positive
Danielatian and	Rank	3	2	1
Population and Communities	Significant effect?	Uncertain	Yes - Positive	Yes - Positive
	Rank	2	1	1
Health and wellbeing	Significant effect?	Uncertain	Uncertain	Uncertain
Equalities diversity and	Rank	3	2	1
Equalities, diversity and social inclusion	Significant effect?	No	No	Yes - Positive
	Rank	=	=	=
Transport and movement	Significant effect?	No	No	No
	Rank	1	2	3
Natural Resources	Significant effect?	No	Uncertain	Uncertain
Diadivaraity and	Rank	=	=	=
Biodiversity and geodiversity	Significant effect?	No	No	No
	Rank	=	=	=
Historic Environment	Significant effect?	No	No	No
	Rank	=	=	=
Landscape	Significant effect?	No	No	No
	Rank	1	2	3
Climate Change	Significant effect?	No	No	No

For ISA themes relating to transport, biodiversity, the landscape and historic environment - the nature and significant effects will be dependent on where the additional growth is located and how development is designed/ implemented. There is no evidence at this stage to suggest that the additional growth proposed under Options 2 and 3 would result in a significant negative effect on these themes as long as the development is located away from sensitive receptors and/ or suitable mitigation is provided.

The higher growth options (2 and 3) are identified as performing better against ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities as the additional growth provides an opportunity to deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County Borough. The appraisal identified the potential for a residual long term significant positive effect for Option 3 on the population and communities, economy and employment and the equalities theme. Option 2 was also identified as having the potential for a long term significant positive effect on the population and communities

theme. Option 1 is less likely to have a residual significant positive effect on these themes as it would only provide a small level of additional growth beyond what is already committed or likely to come forward as windfall during the replacement LDP plan period. It is therefore less likely to deliver a diverse range of new homes, employment opportunities or community infrastructure. The predicted loss in jobs coupled with the low level of housing growth proposed under Option 1 has the potential for a significant long term negative effect in relation to the economy and employment ISA theme.

The appraisal found that as the level of growth increases so does the likelihood for negative impacts on natural resources and climate change through the potential increased loss of greenfield/ agricultural land and mineral resources as well as increased carbon emissions. Options 2 and 3 are predicted to have an uncertain effect against the natural resources theme at this stage as the precise location of development is not known. If development is primarily delivered on greenfield land and important mineral resources then a residual negative effect is likely, with the significance of this effect increasing as the level of growth increases. If the majority of growth can be delivered on brownfield land then there is the potential for a positive effect.

# Appraisal of options for the distribution of growth

The Council identified three potential high-level options for the distribution of growth during the plan period in the Spatial Strategy Options Briefing Paper (2019). These are as follows:

- Option 1 (Current LDP) North (Ebbw Vale, Cwm, Tredegar, Trefil, Pochin, Bedwelty Pits and Brynmawr (including Nantyglo and Blaina)) / South (Abertillery (including Cwmtillery, Six Bells, Brynithel, Llanhileth and Aberbeeg) and Swfrydd) split with most of the growth in the north and with a focus of growth in Ebbw Vale;
- Option 2 (Heads of the Valleys emphasis) North/ South split based on opportunities for growth along the Heads of the Valleys corridor; and
- Option 3 (Balanced growth) Growth equally distributed across the borough settlements based on sustainability of settlement assessments.

A comparative appraisal of these options has been carried out and is presented below. At this stage the preferred level of growth or the location of sites is not known; therefore, a number of assumptions have to be made. The nature and significance of effects will ultimately be dependent on the precise scale and location of development. It is assumed that all of the options would deliver the same level of growth.

#### **ISA Theme: Economy and Employment**

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	1	1	2
Significant effect?	No	No	No

Blaenau Gwent falls within an identified National Growth Area in the National Development Framework Consultation Draft (Aug 2019), which states that growth in the SE Region should be primarily focussed in Cardiff, Newport and the Valleys. Blaenau Gwent suffers from high levels of unemployment and economic inactivity, high benefit dependence and limited employment opportunities which together result in low household incomes. A key challenge for the area is to secure jobs for the future.

Options 1 and 2 propose a similar distribution of growth with a north/ south split. The majority of the growth under these options would be delivered in the north at Tredegar, Ebbw Vale, Brynmawr and Blaina with a smaller level of growth delivered in the south at Abertillery. The main difference between the two is that Option 1 focuses growth in the north at Ebbw Vale; whereas, Option 2 would distribute it more evenly between the settlements in the north of the County Borough. Increased growth at Ebbw Vale through Option 1 takes advantage of the town as the principal hub; enabling large scale regeneration to increase employment opportunities and diversify the economy. In this context, it is considered that an appropriate mix of high quality employment sites will be delivered alongside housing; supporting emerging employment needs and providing greater opportunity for people to work locally. Option 1 will also support regeneration of the wider area through directing a proportion of growth to the surrounding settlements; notably the current LDP identifies Tredegar and Brynmawr as district hubs. Focusing investment in Blaenau Gwent's key communities will contribute positively towards strengthening the local economy through ensuring they are more desirable places to live, learn, and work. Positive effects in this respect are likely to be delivered through Option 2 but to a lesser extent, given less growth at Ebbw Vale will reduce opportunities for strategic scale regeneration. Option 2 will however provide opportunity for greater regeneration at the other settlements (not Ebbw Vale) in the north, leading to long term positive effects.

Discussio

Option 3 proposes the equal distribution of growth at settlements across the County Borough, and therefore performs least positively compared to the other Options given it directs less growth to the north of the County Borough where the principal and majority of district centres are located. Directing a level of growth away from the service/ employment hubs in the north would reduce potential for strategic-scale regeneration, likely leading to smaller-scale, dispersed employment provision, and exacerbating existing high levels of out-commuting. Additionally, this may limit economic growth in the wider County and intensify existing demographic issues. Option 3 would

#### ISA Theme: Economy and Employment

lead to positive effects through directing a level of growth to the south of the County Borough and the district centre of Abertillery. However, it is recognised that given the Lower Ebbw Fach is a very steep valley, opportunities for sustainable expansion are limited.

Compared to neighbouring authorities and Wales, Blaenau Gwent has relatively high levels of out commuting from the County Borough and low levels of people commuting into the authority. It is considered that Options 1 and 2 will perform positively in this respect, as they focus growth at the larger settlements, which will take advantage of the existing public transport, providing sustainable access to jobs and services and supporting self-containment. This will lead to positive effects in terms of encouraging an increase in the percentage of the working age population attaining higher skill levels and enabling young people to reach their full potential. It is however recognised that the ISA Scoping Report and local engagement on the Well-being plan identified issues relating to the lack of bus routes to the main employment areas in Blaenau Gwent. Nonetheless it is considered that focussing growth at the main settlements in the north through Options 1 and 2 compared to Option 3, is more likely to deliver significant transport improvements alongside housing and employment growth/ regeneration. Option 3 is less likely to take advantage of access to existing and future employment and public transport at some of the larger settlements, such as Ebbw Vale, Tredegar and Brynmawr. However, it is recognised that Option 3 will alternatively support a level of growth in close proximity to the M4; notably the A467 in a southwards direction which links the area to Newport and Cardiff, providing access to jobs and services within the wider South East Wales Capital Region.

Taking the above into account, Options 1 and 2 would be more likely to support and have positive effects on the local economy in the north of the County Borough as that is where the majority of growth would be focussed. The higher levels of growth in this area are more likely to deliver a greater range of new employment opportunities and support existing town centres. Option 1 is likely to have a positive effect of greater significance on the local economy in Ebbw Vale, whereas Option 2 would be more positive for the local economies and centres in other settlements in the north but less positive for Ebbw Vale. Option 3 is likely to have a reduced positive effect on the local economy in the north of the County Borough but a more positive effect in the south and more widely at some of the smaller settlements.

#### ISA Theme: Population and communities

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	1	2	3
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive

Historically, the overall population in Blaenau Gwent has fallen since it peaked in 1921. More recently the rate of decline has been more stable, falling by just 3.4% in the 20 year period between the 1991 Census and 2011 Census. The latest Welsh Government housing projections indicate that the number of households in south east Wales will increase by 8.4% (46,500) between 2018 and 2033. Blaenau Gwent will have to accommodate a share of this growth as it falls within a National Growth Area identified in the NDF (August 2019) and to fulfil its regional obligations as part of the Cardiff Capital Region. This will assist by improving the viability of its communities through addressing affordability and demographic issues.

Although Blaenau Gwent is one of the most affordable areas in Wales, the affordability issue remains given the employment characteristics of the County Borough; such as lower paid jobs and high dependence of people on benefits. The location of new development is therefore an important consideration in terms of reaching the development needs of all housing areas, and maximising accessibility to community services and facilities, as well as existing transport infrastructure and employment opportunities. Blaenau Gwent is made up of a number of towns and villages but only a few are large enough to be self-sufficient in terms of comprising an adequate range and mix of services. This is reflected by the high population densities seen, as most of the population is concentrated in 23% of the area; in the towns of Ebbw Vale, Tredegar, Brynmawr, Blaina and Abertillery. Options 1 and 2 will therefore lead to positive effects through directing growth to the majority of these main settlement centres, supporting the creation of a network of sustainable settlements in the north of the County Borough to meet local needs, providing services for existing and new residents.

Positive effects are also likely to be delivered through Options 1 and 2 in terms of providing easily accessible regional services via sustainable transport modes. It is however noted the ISA Scoping Report and local engagement on the Well-being plan identified issues relating to the lack of bus routes to the main employment areas in Blaenau Gwent. Nonetheless it is considered that Options 1 and 2 are more likely to deliver significant transport improvements alongside housing and employment growth/ regeneration by focussing growth at key settlements in the north compared to Option 3.

Discussio

In terms of Option 3, it is considered that balanced growth throughout the County Borough will perform positively against this ISA theme through promoting sustainable growth in the principal and district hubs of the north, while also recognising the role the Abertillery district hub and wider Lower Ebbw Fach Valley in the south. This may contribute towards addressing the demographic and housing affordability challenges throughout Blaenau Gwent, maximising the potential offered by the southern area's unique setting and cultural qualities. However, it is recognised that the Lower Ebbw Fach Valley is a very steep valley which limits opportunities for significant expansion.

It is also considered, under Option 3, that there may not be a critical mass (given more distributed growth) to support the necessary infrastructure for sustainable growth of the Lower Ebbw Fach communities, resulting in continued reliance on services and facilities in the north and outside of the County Borough. Growth is further limited by lack of suitable sites in the south; notably only 7% of new homes are allocated in the current LDP in this area. Balanced growth through Option 3 may also limit the potential for strategic scale regeneration at Ebbw Vale and the district centres to the north, which may lead to increased out-migration and affordability issues. It is however recognised that Option 3 will alternatively support a level of growth in close proximity to the M4; specifically the A467 in a southwards direction which links the area to Newport and Cardiff, providing access to jobs and services within the wider South East Wales Capital Region. It should also be noted that there are plans to extend the Ebbw Vale railway line to Abertillery as part of the Metro project and Cardiff Capital Region City Deal.

Overall, it is considered that all Options will lead to significant effects against this ISA theme through the delivery of growth to meet identified needs. In terms of ranking, Option 1 is considered best performing, due to directing a greater level of growth towards the Principal Hub of Ebbw Vale. This will lead to positive effects through recognising Ebbw Vale's sub-regional role; securing the delivery of new service and facility provisions, infrastructure and employment opportunities. It also takes advantage of access to the railway network and planned

#### ISA Theme: Population and communities

improvements through the Metro project. By focusing development around Ebbw Vale and the district centres in the north, Options 1 and 2 are more likely to support improved connectivity and integration with these key communities, ensuring they are more desirable places to live, learn, and work. Options 1 and 2 are therefore anticipated to lead to long term positive effects through addressing key issues such as housing affordability and deprivation. Option 3 has the potential to support the growth of wider communities across the County Borough and achieve social infrastructure improvements/ provision in the south. It also takes advantage of the opportunity presented by the planned extension of the Ebbw Vale railway line to Abertillery proposed through the Metro project which is likely to be completed in 2022. However, this option performs least well due to the likely isolation of communities, reduced potential for strategic regeneration in the north, and continued poor demographic profile across Blaenau Gwent.

#### ISA Theme: Health and wellbeing

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	1	2	3
Significant effect?	No	No	No

Blaenau Gwent has the lowest percentages of residents assessing their general health as 'very good' health and 'good' health when compared to all other local authorities. Additionally, Blaenau Gwent had the highest proportion of LSOAs in the most deprived 50% in Wales for the health domain. This is reflective of residents' lifestyles, as Blaenau Gwent has the higher proportion of smokers and e cigarette users compared to national figures. Similarly, Blaenau Gwent has higher obesity levels compared to the Aneurin Bevan Health Board and Wales as a whole. In terms of improving the health and wellbeing of residents, Option 1 is anticipated to lead to long term positive effects through supporting a hierarchy of vibrant town and neighbourhood centres in the north of the County Borough. It is considered that the focus of growth in the principal town centre of Ebbw Vale would ensure sustainable access to a range of community services and facilities, including health, leisure and recreation; notably Ebbw Vale contains Ysbyty Aneurin Bevan Hospital, four GP surgeries, six pharmacies, and two dentists.

Positive effects in this respect are also anticipated through Option 2; however, it is recognised that the level of growth directed towards Ebbw Vale is less under this Option and therefore may reduce opportunities for strategic scale regeneration. Nonetheless, it is considered that Option 2 will lead to long term positive effects through focussing growth to district/ local centres at the Heads of the Valley which are likely to be able to satisfactorily accommodate growth.

Option 3, through balancing growth throughout the County Borough, will deliver housing/ employment/ infrastructure that meets the needs of a greater proportion of the resident population/ settlement areas, targeting areas of deprivation to a greater geographical extent. However, it is recognised that there may not be critical mass (due to dispersed and smaller scale growth) at the settlements of Abertillery, Cwmtillery, Six Bells, Brynithel and Llanhileth to support the necessary infrastructure for sustainable growth of these communities. This may result in a reliance on the north for access to health facilities and services; notably Ysbyty Aneurin Bevan Hospital at Ebbw Vale.

## Discussio

Options 1 and 2 support more healthy lifestyles through promoting access to sustainable travel, i.e. cycling and walking routes. Through Option 1, Ebbw Vale is the focal point for locally significant development, which will likely lead to positive effects in terms of increasing levels of self-containment and encouraging active travel. This is also seen through Option 2 to a lesser extent, given growth is distributed proportionately across the Heads of the Valley. This will lead to positive effects through improving physical and mental health and wellbeing, and aiding connectivity throughout Blaenau Gwent and the wider South East Wales Capital Region. In terms of Option 3, balancing the delivery of growth throughout the County Borough will likely limit potential for sustainable transport infrastructure improvements/ delivery, with continued reliance on the A467 which runs in a north-south direction along the length of Blaenau Gwent. Increased reliance on the car for travel may negatively impact upon the overall health of the County Borough, exacerbating high levels of obesity for example. However, it is recognised that there is a railway station a Llanhilleth and a planned extension of the Ebbw Vale railway line to Abertillery through the Metro project, which is scheduled for completion in 2022.

Open Space provision in Blaenau Gwent includes a range of urban and country parks, common land, community sport and recreation grounds and facilities and children's play areas. It is recognised that these spaces play a key role in supporting the health and wellbeing of residents, given the largely urban population, (having the 4th highest population density in Wales). It is considered that Option 3 will lead to positive effects in terms of providing access to the wider natural environment, given growth will be proportionate throughout the County Borough, taking advantage of the steeply sloping wooded hillsides and high quality landscapes to the south, and broader valley sides to the north. It is however considered that Options 1 and 2 have the potential to deliver wide-scale connectivity of Green Infrastructure between key settlements in the north through significant regeneration. This has the potential to deliver improved high quality living environments, and may address the decrease in provision of recreational open space seen (per 1,000 population (FIT standard) provision has declined from 1.11 ha in 2009 to 0.99 ha). Overall, given the rural nature of the County, it is considered that all Options perform well in terms

#### ISA Theme: Health and wellbeing

of providing residents with access to natural open space; supporting the mental and physical health and wellbeing of residents.

Taking the above into consideration, it is considered that all Options provide a significant opportunity to deliver improvements to social/ community infrastructure. The level of infrastructure delivery is expected to be similar under all Options; however, Option 3 performs least positively given development would be more dispersed throughout the County Borough and therefore smaller scale, limiting opportunities for significant regeneration and delivering growth in less accessible/ sustainable locations. However, it is recognised that it does take advantage of the proposed Ebbw Vale railway line extension to Abertillery but this isn't scheduled for completion until 2022. Option 1 is best performing as focussing growth at Ebbw Vale and the Heads of the Valleys would likely capitalise upon existing services/facilities while also delivering new/ improved infrastructure to support sustainable growth and address health deprivation issues. It is also considered that Option 1 and to a lesser extent Option 2, will promote self-containment in Ebbw Vale and the district centres in the north, delivering connected communities that support active sustainable travel.

#### ISA Theme: Equalities, diversity and social inclusion

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	1	2	3
Significant effect?	No	No	No

In terms of local demographics, the latest Welsh Government population projections show a demographic profile in Blaenau Gwent that, if current trends continue the percentage of the population aged 0-15 will decrease by 2% by 2039. This is in contrast to the expected increase across Wales overall. The population aged 16-64 years is expected to decrease by 16% by 2039 which is of significant concern; and the over 65 population is expected to increase by 2039 in line with expectations across Wales.

Option 1 and 2 focus growth at the Principal Hub of Ebbw Vale and District Hubs in the north, which is anticipated to lead to positive effects against this ISA theme through large-scale regeneration; delivering employment, housing and infrastructure to enable the younger population to live and work in Blaenau Gwent. It also directs development to locations which generally have good access to community facilities, public transport links and employment opportunities. Focussing growth at these settlements will enhance their service roles and support connectivity with Ebbw Vale. Option 2 distributes growth more evenly across settlements in the north and is likely to have less of a positive effect for communities in Ebbw Vale but enhanced positive effects for wider communities.

#### Discussio n

Option 3 is more likely to have positive effects for settlements in the south compared to Options 1 and 2. Growth at these settlements would likely lead to strengthened communities, supporting connectivity between centres throughout the County Borough, resulting in improved levels of social inclusion. This is particularly important given the rural nature of Blaenau Gwent, and would contribute positively towards addressing the demographic and housing affordability challenges within both urban and rural communities. Delivering balanced growth at existing settlements would also likely help to address increased pressure on social infrastructure to some extent; however, it is considered that this is unlikely to be significant given the distributed nature of growth and therefore smaller scale sites likely to come forward. This may result in continued reliance on the car to access services and facilities; however, it is recognised that there is a train station at Llanhilleth and a planned extension of the Ebbw Vale railway line to Abertillery through the Metro project, which is scheduled for completion in 2022. It is also recognised that the south has fewer opportunities for development given the topographical constraints present.

Overall, Options 1 and 2 perform better compared to Option 3 as they focus growth at the main settlements in the north of Blaenau Gwent, while still delivering a proportionate level of growth to meet the needs of communities in the south. Focussing growth in the north of Blaenau Gwent is more likely to deliver larger scale growth that could result in greater improvements to community infrastructure. This will likely positively address existing demographic issues in the north of Blaenau Gwent, encouraging younger people to reside and work in the County Borough. While Option 3 will support communities in the wider County Borough, it is considered that significant social infrastructure improvements/ provision is unlikely, given the dispersed nature of growth. This option therefore performs less well due to the potential isolation of communities and continued poor demographic profile across Blaenau Gwent.

### **ISA Theme: Transport and movement**

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	1	2	3
Significant effect?	No	No	No

Technical Advices Note 18 (TAN 18) – 'Transport' sets out the Welsh Government's aim to promote sustainable transport in Wales. Notably, TAN18 focuses on achieving the Welsh Government's environmental outcomes in its Environmental Strategy by "Promoting resource and travel efficient settlement patterns". However, existing travel patterns in Blaenau Gwent reflect its rural nature; with a trend of relatively long travel to work distances, high levels of car ownership and reliance on the private car. Notably, 72.1% of the County Borough's population relies on the private car for their work journey, with only 9.8% of the population walking and 0.5% cycling to work. The area's principal road system provides A-road access to the motorway network (the M4, M5 and M50) and combined with the A470 and A465 Heads of the Valley roads, connects the area with the South East, South West, Midlands and London. There has been an increase in traffic volume of 4.8% since 2010 in Blaenau Gwent, which could reflect the road improvements to the area; notably the dualling of the A465 Heads of the Valleys Road Tredegar to Brynmawr.

In terms of sustainable transport options available, the Ebbw Vale Parkway and Llanhilleth railway stations opened in 2008 and provide an hourly service to Cardiff. It is however noted that improvements have been made to rail provision, and plans are underway to increase the frequency of rail services in Ebbw Vale and Llanhilleth to two trains per hour. The Ebbw Vale town station extension opened in 2015 and provides an extension from the terminus at Ebbw Vale Parkway to the new Ebbw Vale town station. Both stations offer good interchange opportunities with local bus services. The X4 and E3 bus routes connect the railway stations in Ebbw Vale with the settlements of Tredegar, Brynmawr, Nantyglo and Blaina and Abertillery. However, wider bus services in the County Borough are not frequent, varying between 2 and 4 per hour, and there is a more limited service on Sundays. The Public Rights of Way (PRoW) network extends throughout Blaenau Gwent, with 243,805 metres of PRoW accessible to residents and visitors alike, and it is difficult to identify spatial deficiencies in this respect. Additionally, access to cycleways is good throughout the County Borough, with 96% of the population within 1km of the cycle network. 18

Discussio n

Option 1 recognises and promotes Ebbw vale as a regional public transport hub; supporting a safe, efficient, accessible and sustainable transport system. The dualling of the Heads of the Valleys road and improvements to the Ebbw Railway are key in this respect, and it is recognised that focussed growth through Option 1 could present opportunities for further strategic transport improvements. This will likely lead to positive effects in terms of facilitating and supporting the Council's sustainable economic growth and regeneration priorities; connecting principal and district centres in the north to deliver regeneration benefits across the area. Delivering regeneration benefits across the north is also anticipated through Option 2, and will include providing residents with sustainable access to employment areas and wider facilities/ services, reducing reliance on the car and encouraging a modal shift both within and outside of Blaenau Gwent.

Under Option 3, directing a level of growth away from the Heads of the Valleys is likely to limit access to key bus routes and train stations in the north of the County Borough, and limit opportunities to take advantage of the Heads of the Valley dualling. This is likely to exacerbate the current trend of private vehicle use and increase traffic on the highways network; notably along the A467 to the south of the County Borough. It is also considered that balanced growth would limit opportunities for strategic transport improvements/ regeneration in the Principal Hub of Ebbw Vale; as anticipated through Option 1. However, it is recognised that Option 3 would take advantage of a planned extension of the Ebbw Vale railway line to Abertillery through the Metro project, which is scheduled for completion in 2022.

It is recognised that all Options have the potential to contribute positively towards the Welsh Government's commitment to reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport (Planning Policy Wales, Edition 10). However, Option 1 is identified as best performing as it directs growth to the main settlements in the north and particularly Ebbw Vale, which is a multi-modal transport hub benefitting from active travel routes,

<sup>&</sup>lt;sup>17</sup> 2011 Census

<sup>18</sup> Blaenau Gwent County Borough Council (2018) Blaenau Gwent Local Development Plan Annual Monitoring Report 2018

### ISA Theme: Transport and movement

existing railway stations and reasonable bus services. The district centres in the north are also well placed geographically to take advantage of the strategic road network; notably the heads of the valley dualling. Option 2 therefore also has the potential to deliver long term positive effects against this ISA theme. While Option 3 is more likely to take advantage of the train station at Llanhilleth and planned railway line extension to Abertillery, it is considered to perform less well given balanced growth would be likely to deliver large scale growth and that the settlements in the south have less facitlities/ services on offer.

### ISA Theme: Natural resources (air, land, minerals and water)

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	=	=	=
Significant effect?	No	No	No

The distinctive topography of Blaenau Gwent is a key determinant of land use in the County Borough, as with elsewhere in the South Wales valleys. Deeply incised valleys ensure that land suitable for development or agriculture is relatively limited, with steeply sided hillsides topped with moorland naturally focussing activity to the valley floors. In this context, Blaenau Gwent is predominantly natural land (67%), with only 20% of the total land area built on, 5% in use as 'green urban' land such as parks and playing fields, and just 9% in use as farmland. Of the small percentage of land in agricultural use, none is the highest quality 'best and most versatile' (BMV) land and therefore growth under any of the Options will not result in the loss of BMV land.

The average percentage of housing completions on brownfield land over the past 12 years is 81%, reflecting the lack of greenfield supply and that a number of former industrial sites have been unlocked for housing growth as the economic profile of the area has evolved. Given the topographical constraints on greenfield supply it is considered that a reliance on brownfield sites is likely under any of the Options. It is therefore considered that there is little opportunity to differentiate between the Options in terms of minimising land take and maximising efficient use of available land.

Blaenau Gwent has a history of heavy industry, including coal and mineral extraction and iron and steel manufacture. These industries were spread throughout the area and as a result there is likely to be a widespread dispersion of the contaminants associated with this sector. The Scoping Report identifies that a total of nine contaminated sites have been remediated since 2012, although this is in the context of potentially hundreds of remaining sites.

Discussio

In terms of mineral resources, there are a number of both primary and secondary coal safeguarding areas (CSAs) evident in the plan area, as well as deposits of Pennant Sandstone, a High Specification Aggregate (HSA) of national significance. It will be important that the development over the plan period does not sterilise or inhibit the extraction of these deposits where avoidable. However, there are CSAs present around the settlement boundaries of all the key northern settlements, which means that Options 1 and 2 are more likely to result in development that falls within these CSAs in the north. This is not necessarily considered to be a constraint in principle but could require more detailed survey work before allocating sites. Option 3 may perform marginally more positively in terms of ensuring an adequate supply of minerals as there appears to be less potential for new development to affect future access to coal deposits.

The Scoping Report states that air quality in Blaenau Gwent is good, with no recorded exceedances of Nitrogen Dioxide, the principal emission from vehicular traffic. New development has potential to lead to more car users and more transport emissions under all of the Options. However, Options 1 and 2 are considered to perform more strongly in relation to air quality as the dualling of the Heads of the Valleys trunk road will introduce additional capacity, reducing the risk of new development leading to increased traffic and subsequent localised air quality issues. Option 3 is considered to perform slightly less well in relation to air quality on the basis that growth will be partly directed towards Abertillery which may increase the risk of traffic on the A467 corridor, particularly at peak times. However it is recognised that Option 3 will take advantage of the new train station at Llanhilleth and proposed extension of the Ebbw Vale railway line to Abertillery, which isn't scheduled for completion until 2022.

A number of waterbodies in Blaenau Gwent, including rivers and reservoirs are in moderate or poor condition, as per the Water Framework Directive (WFD) classification, though the source of contaminants does not appear to be directly related to housing or employment growth. As such it is not possible to differentiate between the options in terms of water quality.

On balance, it is considered that the Options perform broadly on a par in relation to this ISA theme. While small differences between Options can be identified against individual aspects of the ISA theme, it is considered that there is no significant difference in the overall performance of each of the Options. Significant effects are not anticipated.

### ISA Theme: Biodiversity and geodiversity

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	2	2	1
Significant effect?	Uncertain	Uncertain	No

It is assumed that development proposed under any of the Options would not result in the loss of any international, national or locally designated sites for biodiversity, though there could still be potential for harm to these sites from development which is sited nearby.

The northern area of the County Borough is considered to be more sensitive in biodiversity terms as the majority of designated sites are located here. This includes two European sites and their component Sites of Special Scientific Interest (SSSIs) that fall partially within the north of the County Borough. The Usk Bat Sites Special Area of Conservation (SAC) is primarily designated for its population of Lesser Horseshoe Bats, whilst the Cwm Clydach Woodlands SAC is designated for its calcareous beech woodland and acid beech woodland. Additional development proposed through the RLDP is most likely to have impacts on these European sites through the loss and fragmentation of linear foraging habitats for bat species and through increased disturbance (recreation, noise and light).

The Cwm Merddog Woodlands SSSI falls entirely within the plan area and is comprised of two parcels of land that are situated to the north east of the village of Cwm in the centre of the County Borough. Two further SSSIs fall partly within the plan area in the north, Mynydd Llangatwg SSSI and Brynmar Sections SSSI. There are an unusually large number of special features associated with Mynydd Llangatwg SSSI, suggesting particularly notable sensitivity. The management statements for these SSSIs suggest that the management of the land is key to maintaining a favourable condition status, highlighting the importance of managing new development in the vicinity of the sites. Disturbance is identified as an issue for both sites and it is likely that additional growth nearby would increase the risk of disturbance further.

## Discussio

n

Similarly, of the 12 Local Nature Reserves (LNR) in the Plan area there is a notable concentration in the north along the Heads of the Valleys road corridor, with the remainder more evenly distributed. Options 1 and 2 would direct the majority of growth to the Heads of the Valleys, which may lead to additional recreational pressure on the Beaufort Hills Pond and Woodland LNR and the Parc Nant-y-Waun LNR in particular. A number of Sites of Importance for Nature Conservation (SINCs) surround the urban areas of Blaenau Gwent and several lie within the urban areas, suggesting that growth under any of the Options will likely have localised effects on SINCs.

Options 1 and 2 focus a greater proportion of growth in the north of the County Borough and are therefore considered more likely to have impacts on the designated SACs and SSSIs, as well as on locally designated sites, through the introduction of greater recreational pressure and higher emissions from the associated additional vehicle users. However, by concentrating growth in the north, Options 1 and 2 may potentially offer opportunities to deliver larger scale developments (subject to land supply) offering greater potential to deliver strategic green infrastructure, including the potential for achieving a more significant level of biodiversity net gain. The more dispersed approach to growth proposed through Option 3 may limit the strategic opportunities for delivering green infrastructure and net gain.

On balance, Option 3 is considered best performing in relation to this ISA theme through distributing growth to both the north and the south of the County Borough. This will ensure that harmful effects are not concentrated in one location, potentially minimising the net effect of additional housing growth on any one part of the Plan area. In particular, avoiding the concentration of growth away from the SACs and SSSIs to the north east of Blaenau Gwent is a notable positive effect of Option 3.

### **ISA Theme: Historic environment**

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	=	=	=

#### ISA Theme: Historic environment

Significant	No	No	No
effect?			

A number of historic assets are distributed across Blaenau Gwent, both in the urban areas and in more rural locations. 53 listed buildings are distributed relatively evenly between the principal northern settlements, though a cluster of listed buildings is evident at Tredegar, suggesting heightened historic sensitivity. The cluster at Tredegar corresponds with the area around the County Borough's only Registered Historic Park and Garden (RHPG) at Bedwellty Park, which is also a designated Conservation Area. A second Conservation Area at Tredegar, the Southern Town Area, lies immediately north of Bedwellty Park. In general, however, the distribution of Listed Buildings within the north of Blaenau Gwent is scattered, with no other hotspots of particular heritage sensitivity. There is a notable absence of listed buildings in the south by comparison, and there are no other Conservation Areas or RHPGs.

Blaenau Gwent's 13 Scheduled Ancient Monuments are predominantly within or adjacent to the existing settlements, with a particular focus in the northern settlements. These features reflect both the industrial history of the area and its ancient Celtic heritage. For example, features such as the Marine Colliery Pumping Engine in Ebbw Vale and the Incline Haulage Winding Engine near Tredegar contribute to an understanding of the area's industrial heyday, whilst features such as cairns, hut circles and mounds point to a historic identity dating back to a much older era. Whilst it will be important to avoid development which results in negative effects on these features, it is considered that the choice of spatial strategy has a limited role to play. None of the Options offer notable positives or negatives in relation to the County Borough's Scheduled Ancient Monuments.

## Discussio

New development can offer the potential opportunity to promote, protect and enhance heritage assets, supporting the distinct sense of identity at each settlement, and building on established heritage and cultural identity. However, new development could also have potential for negative effects on the historic environment, if design, layout and massing of new schemes detracts from the overall historic character of an area or obscures specific historic features and their settings.

It is recognised that Blaenau Gwent's cultural assets also include the use of the Welsh language. None of the Options are considered likely to have a significant effect on the Welsh language, and it is therefore not possible to distinguish between the Options in this respect.

Taking the above into consideration, it is difficult at this stage to meaningfully differentiate between the Options in relation to their effects on the historic environment. Clearly, there is a need to avoid development with negative effects on the cluster of heritage designations at Tredegar, including the two Conservation Areas and the RHPG, though this will be informed more by the detailed design of any future scheme. Similarly the effects from development on other individual assets more evenly dispersed through the County Borough, including Listed Buildings and Scheduled Monuments, will likely be determined at the planning application stage rather than by the selection of the spatial strategy. Whilst Option 3 would direct a greater proportion of growth towards the south of Blaenau Gwent, which has notably fewer designated historic assets, it is considered that this Option would also offer fewer opportunities to contribute to enhancing the existing built heritage of the wider area. This is given that balancing growth throughout the County Borough does not offer the same opportunity as other Options to deliver neutral/ positive effects through strategic contributions to an area's character or appearance. On balance it is considered that all Options perform broadly on a par in relation to the historic environment ISA theme and that significant effects are not anticipated.

#### ISA Theme: Landscape

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	1	1	2
Significant effect?	No	No	No

A defining feature of the plan area is its landscape setting among the deep valleys and high peaks and ridges of South Wales. The landscape of Blaenau Gwent has had clear influence over its development to date, with the urban areas necessarily channelled along the valley floors which are flanked on either side by often steeply sided and undevelopable gorges and hillsides. This creates a distinctive backdrop to the principal settlements in the plan area and it is likely that future development will continue to be informed by this distinctive landscape context. The south of the County Borough demonstrates these characteristics most strongly, whilst the north is slightly more open in character with gentler changes in landform allowing longer views out to the hills beyond. These views from the area's settlements out to the high ground beyond are a clear influence on the character and identity of Blaenau Gwent as a whole.

The high quality of Blaenau Gwent's landscapes is reflected by the designation of eight Special Landscape Areas (SLAs) within the plan area. SLAs are a local designation, made where landscapes "require special protection for their own sake as part of the County's landscape resource" (Scoping Report, 2018). SLAs cover a total area of approximately 7,614 hectares, accounting for approximately 70% of the total local planning area within Blaenau Gwent. SLAs surround Ebbw Vale and Brynmawr, notably along the settlement boundary where the County Borough adjoins with the Brecon Beacons National Park (BBNP), indicating particular landscape sensitivity at the transition to the BBNP. The BBNP lies partly within the north east of the County Borough and is otherwise adjacent to much of the northern boundary. In this context development within Blaenau Gwent could have potential to affect the setting of the BBNP and the character of the settlements which lie adjacent to it, such as Bynmawr. However, in practice much of the Heads of the Valleys corridor is already built up and so views from the BBNP into Blaenau Gwent are already partially of an urban environment, albeit one which is framed by undeveloped higher ground.

Discussio n

Directing the majority of additional growth to the northern settlements, as per Options 1 and 2, therefore offers potential for development to sit comfortably within the existing built context without necessarily impacting views into the area from the Brecon Beacons and other surrounding areas of high ground. Option 3 would direct higher growth to the south of the County Borough, which appears notably more constrained in landscape capacity terms. In this context, it is considered that even if growth in the south were delivered largely on brownfield sites, it would likely be necessary to densify considerably to achieve high growth. This has the potential to affect how settlements in the south are perceived within the landscape, particularly Abertillery which has a distinctive and characterful setting within the valley. In this context it is considered that the north of the County Borough has slightly lower landscape sensitivity, despite the proximity of the BBNP. The northern settlements, and particularly along the Head of the Valleys corridor, already represent a substantial urbanised area and are viewed in the landscape in this context, whilst the south is notably more rugged and less developed, and its dramatic landscape setting is considered more sensitive to change.

Overall, it is considered that Options 1 and 2 perform most positively against this ISA theme, given these Options are most likely to protect the key views and visual amenity of the dramatic landscape of the south. Options 1 and 2 are therefore more likely to deliver development which reflects and protects the value of the area's diversity of landscapes, built environments and distinctive communities. Significant effects are not anticipated under any of the Options.

### ISA Theme: Climate change

Options	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth
Rank	3	2	1
Significant effect?	Uncertain	Uncertain	Uncertain

The Blaenau Gwent Renewable Energy Assessment (2011) identifies that there is potential for more of the County Borough's electricity and heat requirements to be generated by renewable and low/ zero carbon technologies. These technologies include: onshore wind; landfill gas; energy crops; energy from waste; anaerobic digestion; sewage gas; hydropower; biomass; combined heat and power and buildings integrated renewables. In this context, it is considered that development under any of the Options has the potential to incorporate renewable or low carbon energy. This will be established at the project scale, incorporating the energy hierarchy into design as set out in Technical Advice Note (TAN) 22: Planning for Sustainable Buildings. The NDF Consultation Draft (August 2019) identifies areas (in both the north and south) of Blaenau Gwent as being a priority area for solar and wind energy. Taking this into account, it is concluded that at this stage Options cannot be differentiated in this respect.

The topography of Blaenau Gwent is dominated by relatively steep sided valleys; however, areas in the north of the County Borough have a gentler topography, as they are located within the foothills of the Brecon Beacons. There are two substantial main rivers that pass through Blaenau Gwent; the Rivers Ebbw and Sirhowy. It is noted that there is also the Ebbw Fawr in the central valley and the Ebbw Fach in the east, which meet at Aberbeeg and below this point the river is referred to as the Ebbw. The topography of both the river Ebbw and Sirhowy is characterised by narrow river channels bounded by steep sided valleys, with limited floodplains.

A Preliminary Flood Risk Assessment (PFRA) (June 2011) was undertaken to support the current LDP. At this stage, it provides a high level overview of flood risk in the County Borough. It shows local flood risk in Blaenau Gwent from ordinary watercourses, surface runoff, ground water, and the interface between main rivers and surface water flows. 19 To assess the local flood risk identified through the PFRA Blaenau Gwent adopted the 'blue square' method in which 1km blue squares identify areas where either:

## Discussio

n

- more than 200 people;
- more than one critical service; or
- more than 20 non-residential properties

are predicted to be flooded at a depth of more than 0.3m in a rainfall event with a 1 in 200 annual chance of occurrence (0.5%) based on inspection of the FMfSW developed by the Environment Agency. 29 'blue squares' have been identified in Blaenau Gwent. The location of these flood risk areas are identified within Figure 4.3 of the Local Flood Risk Management Strategy (2013). Figure 4.3 shows flood risk areas along the heads of the valleys and down the valleys in accordance with the watercourses present.

Two clusters of flood risk have been identified, at Abertillery, and Ebbw Vale and Tredegar, where there are historic river courses and waterways. As only Ebbw Vale and Tredegar meets the minimum population criteria, it is the only Indicative Flood Risk Area identified. Within Ebbw Vale, the following are at risk: 2,856 properties, 6683 people, 28 critical services and 693 non-residential properties. In Abertillery, 993 residential properties are at risk, 2,324 people, 6 critical services and 156 non-residential properties are at risk. All Options therefore direct development to areas identified as being at high risk from flooding. It is however considered that Option 1 performs least well in this respect given high growth is focussed around Ebbw Vale which has been identified as a Flood Risk Area.

It is however considered that all new development will accord with Technical Advice Note 15: Development and Flood risk (2004), which sets out a precautionary framework to direct new development away from those areas which are at high risk of flooding. To this effect, in accordance with national policy, information will need to be provided to demonstrate that any development proposal satisfies the tests contained in the TAN.

There are no records of sewer flooding with significant consequences within Blaenau Gwent.

<sup>19</sup> Blaenau Gwent County Borough Council (2015) Blaenau Gwent County Borough Council Flood Risk Management Plan

## Summary findings and conclusions for distribution options

			Categorisation and rank		
ISA Themes	Rank/ significant effect	Option 1 - Current LDP	Option 2 - Heads of the Valleys emphasis	Option 3 - Balanced growth	
	Rank	1	1	2	
Economy and Employment	Significant effect?	No	No	No	
Danislatian and	Rank	1	2	3	
Population and Communities	Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	
	Rank	1	2	3	
Health and wellbeing	Significant effect?	No	No	No	
Favorities diversity and	Rank	1	2	3	
Equalities, diversity and social inclusion	Significant effect?	No	No	No	
	Rank	1	2	3	
Transport and movement	Significant effect?	No	No	No	
	Rank	=	=	=	
Natural Resources	Significant effect?	No	No	No	
Biodiversity and	Rank	2	2	1	
geodiversity	Significant effect?	Uncertain	Uncertain	No	
	Rank	=	=	=	
Historic Environment	Significant effect?	No	No	No	
	Rank	1	1	2	
Landscape	Significant effect?	No	No	No	
	Rank	3	2	1	
Climate Change	Significant effect?	Uncertain	Uncertain	Uncertain	

The appraisal found that there is little to differentiate between the Options at this stage with regard to the historic environment and natural resources ISA themes. This is given that all Options have the potential for impacts through directing development to areas that are sensitive in terms of heritage, air, land, mineral and water constraints; albeit in different areas of the County Borough. Development also has the potential to deliver positive effects through mitigation and environmental improvement/ enhancement measures secured at the project scale. While significant negative effects are not anticipated for any of the options this will ultimately be dependent on the precise location and the design/ layout of development.

In terms of the landscape theme, Options 1 and 2 direct development to more urban areas in the north of the County Borough, that are less sensitive in landscape terms than the south. Option 3 distributes growth evenly throughout the County Borough and is therefore more likely to impact upon key views and visual amenity of the south. Option 3 is therefore worst performing in this respect.

Conversely, Option 3 is best performing in terms of the biodiversity ISA theme, given dispersed growth will avoid concentrating growth in close proximity to sensitive biodiversity designations; notably avoiding the European and nationally designated biodiversity sites to the north east of Blaenau Gwent. However, while Options 1 and 2 are considered more likely to lead to negative effects on designated biodiversity sites in the north, these Options (notably Option 1) may offer increased opportunity to deliver larger scale development with greater potential to deliver strategic green infrastructure, including the potential for achieving a net gain in biodiversity at a greater scale. However, this is uncertain at this stage.

Option 1 is best performing against ISA themes relating to communities, health, economy, transport, and equalities, followed by Option 2, with Option 3 identified as worst performing. Positive effects of greatest significance are predicted through Option 1 as a result of focussing more growth at the principal hub of Ebbw Vale, where there is better access to existing employment and facilities/ services, and an opportunity deliver large-scale regeneration. This will help to reduce reliance on the private vehicle, encourage a modal shift and support connected, sustainable communities.

Option 2 also directs growth to the Heads of the Valleys, with less emphasis on Ebbw Vale. Option 2 therefore performs less positively than Option 1 as it would result in a higher level of growth at lower order settlements across the Heads of the Valleys, reducing opportunities to capitalise upon strategic regeneration at Ebbw Vale. However, Option 2 will lead to positive effects through providing opportunity for greater regeneration at the other settlements (not Ebbw Vale) in the north. This will lead to improved connectivity and integration across the Heads of the Valleys, addressing key issues such as housing affordability and deprivation.

Option 3 performs less well given there is generally poorer access to sustainable transport, employment opportunities and facilities/ services in the wider County Borough. However, it is recognised that there is a train station in Llanhilleth and a proposed extension of the Ebbw Vale railway line to Abertillery through the Metro project. Delivering balanced growth is nonetheless likely to encourage the trend of private vehicle use and could impact upon the more vulnerable and less mobile members of the community, such as the elderly. While Option 3 would deliver a level of growth to rural communities to the south and contribute towards meeting local needs, it is considered that this Option would be less likely to deliver larger scale growth and therefore provide the critical mass to deliver greater infrastructure improvements. This may lead to exacerbated demographic issues and increased levels of out-commuting. It is also recognised that the south has fewer opportunities for development given the topographical constraints present.

Option 3 is identified as performing better than Options 1 and 2 in terms of the climate change theme as it directs less growth to areas identified as having high flood risk. However, it is recognised that all new development will accord with Technical Advice Note 15: Development and Flood risk (2004), which sets out a precautionary framework to direct new development away from those areas which are at high risk of flooding. To this effect, in accordance with national policy, information will need to be provided to demonstrate that any development proposal satisfies the tests contained in the TAN.

## **Appraisal of spatial strategy options**

The Council merged the potential options for the level and location of growth to identify four realistic spatial strategy options. The first Option 1 (Growth and Regeneration) is based on the current LDP and involved a medium level of growth; with a north south divide and a focus of growth on Ebbw Vale; and a settlement hierarchy based on an analysis of the roles of towns.

Option 2 (Balanced and Interconnected Communities) involves a low level of growth; with equal distribution across the borough; and based on using the sustainable assessment of settlements to distribute this growth. Option 3 (Economic Growth Strategy) involves high growth; with a north south split based on opportunities for growth along the Heads of the Valleys; using the sustainable assessment of settlements to distribute the growth. Option 4 (Sustainable Economic Growth) is the same as option 3 but spreads the growth equally across the Borough. The four options are set out in more detail in the table below.

Name	Growth Level	Spatial Distribution	Settlement Hierarchy
Option 1: Growth and Regenera tion (current LDP)	Option 2 Medium Growth Population: 162 to 690 gain (0.2 to 1% growth) Housing: 79-94 per annum Total 1,185-1,410 Employment: loss of 52 to 36 per annum (Total loss of between 540 to 780)	Option 1  North / South split with most of the growth in the north and with a focus of growth in Ebbw Vale Option	Option 1 Principal Hub: Ebbw Vale District Hubs: Tredegar/ Brynmawr/ Abertillery Local Hub: Blaina
Option 2: Balanced and Interconn ected Communi ties	Option 1 Low Growth Population: Loss of 857 to 1,815 (-2.6 to -0.8% loss) Housing: 19-54 per annum (Total: 285-810) Employment: loss of 94 to 59 per annum (Total loss of – 810 to 1,410)	Option 2 Growth equally distributed across the borough based on sustainability of settlement assessment	Option 2 Tier 1: Principal Settlements Ebbw Vale/ Tredegar/ Brynmawr / Nantyglo / Blaina/ Abertillery / Cwmtillery / Six Bells / Brynithel / Llanhileth / Aberbeeg Tier 2: Secondary Settlements Cwm Tier 3: Hamlets Trefil/ Pochin/ Bedwellty Pits/ Swfrydd
Option 3: Economi c Growth Strategy	Option 3 High Growth Population: 1,996 to 5,009 (2.9 to 7% growth) Housing: 141 to 226 per annum (Total 2,115 to 3,390) Employment: 74 per annum (Total -45 to plus 1,110)	Option 3  North / South split based on opportunities for growth along the Heads of the Valleys corridor	Option 2 Tier 1: Principal Settlements Ebbw Vale/ Tredegar/ Brynmawr / Nantyglo / Blaina/ Abertillery / Cwmtillery / Six Bells / Brynithel / Llanhileth / Aberbeeg Tier 2: Secondary Settlements Cwm Tier 3: Hamlets Trefil/ Pochin/ Bedwellty Pits/ Swfrydd
Option 4: Sustaina ble Economi c Growth Strategy	Option 3 High Growth Population: 1,996 to 5,009 (2.9 to 7% growth) Housing: 141 to 226 per annum (Total 2,115 to 3,390) Employment: 74 per annum (Total - 45 to plus 1,110)	Option 2 Growth equally distributed across the borough based on sustainability of settlement assessment	Option 2 Tier 1: Principal Settlements Ebbw Vale/ Tredegar/ Brynmawr / Nantyglo / Blaina/ Abertillery / Cwmtillery / Six Bells / Brynithel / Llanhileth / Aberbeeg Tier 2: Secondary Settlements Cwm Tier 3: Hamlets Trefil/ Pochin/ Bedwellty Pits/ Swfrydd

## ISA Theme: Economy and employment

Options	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy	
Rank	2	3	1	1	
Signific ant effect?	Uncertain	Yes - Negative	Yes - Positive	Yes - Positive	
Discuss ion	Against the backdrop of the plan area's economic challenges, particularly in relation to reducing unemployment and securing quality employment opportunities, Options 3 and 4 are considered to				

### ISA Theme: Economy and employment

perform most strongly in relation to the economy and employment ISA theme. Both options seek high housing and employment growth in the plan area, targeting the delivery of up to 1,000+ new jobs over the plan period, whilst also delivering correspondingly high housing growth to sustain and enhance the vitality of the local workforce. It is recognised that anticipated growth under each option could fall within a broad range, so effects will depend on the final quantum of growth, though there could be potential for significant positive effects if the upper end of the range is achieved. Option 3 directs growth to the Heads of the Valleys corridor, leveraging the upgraded transport connections provided by the dualling of the A465 and focussing growth at the plan area's most economically productive region. Option 4 achieves a more even distribution of growth throughout the plan area. This could help distribute the economic benefits of new employment and housing growth more widely, though it is not clear whether the market would deliver significant expansion of employment land in locations with lower capacity transport links and more distant from the main population centres in the north. Option 4 could also take advantage of the proposed extension of the Ebbw Vale railway line to Abertillery but this is not scheduled for completion until 2022.

Option 1 delivers lower housing growth of under 100 dwellings per annum across the plan area and a negative employment growth, with up to 780 jobs anticipated to be lost over the plan period. There is clear potential for negative effects in relation to the economy and employment ISA theme from the loss of employment and the low rate of housing growth will likely have a negligible impact on boosting the local workforce to help create an environment in which businesses can thrive. Option 2 is considered likely to result in significant negative economic effects as it would deliver negative growth in both housing and employment, with the potential reduction in jobs of up to 1,410 over the plan period and a corresponding fall in overall population and, therefore, the workforce. Option 2 would likely exacerbate the existing economic and associated social challenges faced in Blaenau Gwent through a reduction in economic productivity and the associated opportunities that economic output generates. However, it is recognised that there are other ways of increasing employment such as increasing the economic activity rate, reducing unemployment and the out commuting ratio.

In light of the above it is considered that Options 3 and 4 perform broadly on a par as the strongest options in relation to the economy and employment ISA themes with the potential for a long term significant positive effect. In comparison Option 1 performs notably less strongly and Option 2, under which significant negative effects are anticipated, performs particularly poorly with negative growth anticipated for employment.

### ISA Theme: Population and communities

Options	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Rank	2	3	1	1
Signific ant effect?	No	Yes - Negative	Yes - Positive	Yes - Positive

It is assumed that as the level of growth increases, so does the likelihood that the higher growth options will be able to deliver a greater range and mix of new homes to help meet the needs of all residents in Blaenau Gwent. A higher level of residential development would also support the growth aspirations of County Borough and the wider region. Higher levels of growth are also likely to deliver greater improvements to the public realm and community infrastructure, depending on how that growth is distributed. However, it is recognised that there are a number of uncertainties.

Options 3 proposes a high level of growth and directs it largely to the Heads of the Valley corridor. This is considered likely to achieve the highest level of community infrastructure improvements as by focussing growth towards one part of the plan area there could potentially be opportunities to deliver strategic development, which includes additional services and facilities. Larger developments are also likely to provide opportunities for delivering a wider housing mix. Option 4 also proposes the delivery of a high level of growth, though by distributing this evenly throughout the plan area there may potentially be fewer opportunities to seek strategic development and the associated investment in new and enhanced community infrastructure. However, by distributing high growth throughout the plan area there could be opportunities to deliver a range of housing to meet community needs in the south of Blaenau Gwent as well as the north which would be a positive effect. It would also take advantage of the proposed extension of the Ebbw Vale railway line to Abertillery but this wouldn't be completed until 2022.

## Discuss ion

Option 1 performs less well against this ISA theme compared to Options 3 and 4 as it proposes a lower level of growth during the plan period. While the focus of growth in the Heads of the Valleys under Option 1, in particular the focus on Ebbw Vale, could provide an opportunity for strategic development and therefore greater improvements to community infrastructure the lower level of growth makes this less likely compared to Option 3. Option 2 would deliver the lowest level of growth of all the options during the plan period and could potentially result in the employment and housing needs of the County Borough not being met. What little growth is delivered would be equally distributed across Blaenau Gwent and is therefore likely to result in small scale development spread across the plan area. As a result, it is predicted that Option 2 has the potential for a significant negative effect on the population and communities theme.

In this context, Options 3 and 4 are considered to perform relatively on par, with both anticipated to deliver significant positive effects in relation to the population and communities ISA theme. Option 1 performs more poorly given the lower level of growth, though significant effects are not anticipated, whilst Option 2 is notably poorly performing and is anticipated to result in significant negative effects.

#### ISA Theme: Health and wellbeing

Options	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Rank	3	4	1	2
Signific ant effect?	Uncertain	No	Yes - Positive	Uncertain

Given the high-level nature of the options and uncertainties at this stage, it is difficult to highlight any significant differences between the options or conclude that any are likely to have a significant effect on this ISA theme. It could be suggested that as the level of growth increases so does the potential for a greater loss of green/ public open space; however, this is dependant on the location of development. Furthermore, the higher levels of growth could increase pressure on existing health services. Conversely, it could be argued that the higher levels of growth could be more likely to deliver new areas of good quality and accessible public open/ green space and recreational areas as well as be more likely to deliver improvements to health services.

It is assumed that as the level of growth increases so does the likelihood that access to new homes and jobs will be improved for communities with indirect long term positive effects on health and wellbeing. Taking the above into account, Option 2 is considered to perform less well against this theme compared to the other options as it proposes a much lower level of growth during the plan period. Similarly, Option 1 is not likely to perform as well as Options 3 and 4 as it proposes less growth.

In terms of the distribution, Options 1 and 3 are anticipated to lead to long term positive effects through supporting a hierarchy of vibrant town and neighbourhood centres in the north of the County Borough. It is considered that the focus of growth in the principal town centre of Ebbw Vale under Option 1 would ensure sustainable access to a range of community services and facilities, including health, leisure and recreation; notably Ebbw Vale contains Ysbyty Aneurin Bevan Hospital, four GP surgeries, six pharmacies, and two dentists. Positive effects in this respect are also anticipated through Option 3; however, it is recognised that the level of growth directed towards Ebbw Vale is less under this Option and therefore may reduce opportunities for strategic scale regeneration. Nonetheless, it is considered that Option 3 will lead to long term positive effects through focussing growth to Principal and Main Settlements at the Heads of the Valley which are likely to be able to satisfactorily accommodate growth.

## Discuss ion

Given the focus on the larger settlements in the north, Options 1 and 3 are also more likely to support more healthy lifestyles through promoting access to sustainable travel, i.e. cycling and walking routes. Through Option 1, Ebbw Vale is the focal point for locally significant development, which will likely lead to positive effects in terms of increasing levels of self-containment and encouraging active travel. This is also seen through Option 3 to a lesser extent, given growth is distributed proportionately across the Heads of the Valley. This will lead to positive effects through improving physical and mental health and wellbeing, and aiding connectivity throughout Blaenau Gwent and the wider South East Wales Capital Region. Furthermore, Options 1 and 3 have the potential to deliver wide-scale connectivity of Green Infrastructure between key settlements in the north through significant regeneration. This has the potential to deliver improved high quality living environments, and may address the decrease in provision of recreational open space seen (per 1,000 population (FIT standard) provision has declined from 1.11 ha in 2009 to 0.99 ha).

Options 2 and 4 through balancing growth throughout the County Borough, will deliver housing/ employment/ infrastructure that meets the needs of a greater proportion of the resident population/ settlement areas, targeting areas of deprivation to a greater geographical extent. However, it is recognised that there may not be critical mass (due to dispersed and smaller scale growth) to support the necessary infrastructure for sustainable growth of communities. This may result in a reliance on the north for access to health facilities and services; notably Ysbyty Aneurin Bevan Hospital at Ebbw Vale. This is likely to be a particular issue for Option 2 which proposes a low level of growth during the plan period.

Balancing the delivery of growth throughout the County Borough under Options 2 and 4 will likely limit potential for sustainable transport infrastructure improvements/ delivery, with continued reliance on the A467 which runs in a north-south direction along the length of Blaenau Gwent. Increased reliance on the car for travel may negatively impact upon the overall health of the County Borough, exacerbating high levels of obesity for example. However, it is recognised that there is a railway

## ISA Theme: Health and wellbeing

station at Llanhilleth and a planned extension of the Ebbw Vale railway line to Abertillery through the Metro project, which is scheduled for completion in 2022.

Options 2 and 4 could lead to positive effects in terms of providing access to the wider natural environment, given growth will be proportionate throughout the County Borough, taking advantage of the steeply sloping wooded hillsides and high quality landscapes to the south, and broader valley sides to the north.

Taking the above into account, it is considered that Option 3 performs better against this ISA theme compared to the other options given the proposed higher level of growth and focus of development at the main settlements in the north of the County Borough. The higher level of growth is likely to deliver larger scale development and therefore provide greater opportunities for improvements to community (including health) infrastructure. Directing growth towards the larger settlements in the north will also provide opportunities for sustainable access to the greater range of community services and facilities, including health, leisure and recreation, on offer. Option 4 proposes the same level of growth as Option 3 but seeks to distribute it more evenly across the borough. As a result, it is considered more likely to deliver growth at the smaller settlements and more rural areas of the borough and is therefore less likely to provide opportunities to use sustainable modes of transport. Option 1 proposes a similar distribution of development compared to Option 3 but a lower level of growth so is less likely to deliver large scale growth and associated improvements to community infrastructure. Option 2 performs less well against this ISA theme compared to the other options as it proposes the lowest level of growth and seeks to deliver it evenly across the borough.

ISΔ	Thoma:	Equalities.	divoreity	, and	social	inclusion
IJA	ineme.	Equalities.	uiveisiti	, aliu	SUCIAL	IIICIUSIUII

Options	- I - I - I - I - I - I - I - I - I - I		Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Rank	2	3	1	2
Signific ant effect?	Yes - Positive	No	Yes - Positive	Yes - Positive

Given the high-level nature of the options and uncertainties at this stage, it is difficult to determine how specific communities and protected characteristics are likely to be affected. As indicated through the appraisal under other themes, increased levels of growth provide an opportunity to deliver a greater mix of housing and employment to meet the needs of all members of the community. There is also the potential to deliver greater improvements to community infrastructure and the public realm, but this is uncertain at this stage. In this context, a higher level of growth could help to address areas of deprivation depending on where it is located. Furthermore, a higher level of growth could also be more likely to meet the needs of people across a wider area of the County Borough; however, again this would be dependent on the preferred spatial strategy. It could be argued that a lower level of growth could help to protect the identity of existing communities, but this will also be dependent on where development is located and how it is designed/implemented.

Option 1 and 3 focus growth at the Principal and Main Settlements in the north, which is anticipated to lead to positive effects against this ISA theme through larger scale regeneration; delivering employment, housing and infrastructure to enable the younger population to live and work in Blaenau Gwent. It also directs development to locations which generally have good access to community facilities, public transport links and employment opportunities. Focussing growth at these settlements will enhance their service roles and support connectivity with Ebbw Vale. Option 3 distributes growth more evenly across settlements in the north and is likely to have less of a positive effect for communities in Ebbw Vale but enhanced positive effects for wider communities. However, this is uncertain given that Option 3 proposes a higher level of growth compared to Option 2.

# Discuss ion

Option 4 is more likely to have positive effects for settlements in the south and more rural communities compared to the other options. Growth at these settlements would likely lead to strengthened communities, supporting connectivity between centres throughout the County Borough, resulting in improved levels of social inclusion. This is particularly important given the rural nature of Blaenau Gwent, and would contribute positively towards addressing the demographic and housing affordability challenges within both urban and rural communities. Delivering balanced growth at existing settlements would also likely help to address increased pressure on social infrastructure to some extent; however, it is considered that this is unlikely to be significant given the distributed nature of growth and therefore smaller scale sites likely to come forward. This may result in continued reliance on the car to access services and facilities; however, it is recognised that there is a train station at Llanhilleth and a planned extension of the Ebbw Vale railway line to Abertillery through the Metro project, which is scheduled for completion in 2022. It is also recognised that the south has fewer opportunities for development given the topographical constraints present. While Option 2 proposes a similar distribution of growth across the borough it would only deliver a low level of growth and is therefore likely to have a reduced positive effect compared to the other options.

Overall, Option 3 performs better compared to the other options as it proposes a higher level of growth and focuses it at the key settlements in the north taking advantage of opportunities for growth along the Heads of the Valley corridor. As a result, this option is more likely to deliver housing, employment and new community infrastructure at some of the more deprived communities in the borough. While Option 1 also focuses growth in the north of the borough it proposes a lower level of growth and is therefore likely to have a reduced positive effect. Option 4 proposes a high level of growth but proposes that it is distributed equally across the borough which is likely to deliver smaller scale growth and less significant improvements to community infrastructure. Option 2 performs the work against this ISA theme as it proposes the lowest level of growth and distributes it evenly across the borough, it is therefore less likely to have a significant long term positive effect.

### **ISA Theme: Transport and movement**

Options	Option 1 - Growth and regeneration (current LDP)  Option 2 - Balanced and interconnected communities		Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Rank	2	4	1	3
Signific ant effect?	Uncertain	No	Yes - Positive	Uncertain

The small level of additional growth proposed under Option 2 is unlikely to have a significant effect in terms of congestion on the existing highways network. While the additional development proposed under Option 1 and in particular Options 2 and 3 have the potential to increase traffic; the nature and significance of the effects will be dependent on where the precise location of development as well as the infrastructure improvements that might be provided as a result of that growth. The higher growth options provide an opportunity to deliver co-ordinated large scale growth that could provide housing, employment and community infrastructure which can help to reduce the need to travel by private vehicle. At this stage, there is no evidence to suggest that the higher levels of growth would have a significant negative effect on the highway network; however, if further evidence emerges that suggests there is likely to be a significant issue then the findings of the ISA will need to be updated to reflect this.

In terms of sustainable transport options available, the Ebbw Vale Parkway and Llanhilleth railway stations opened in 2008 and provide an hourly service to Cardiff. It is however noted that improvements have been made to rail provision, and plans are underway to increase the frequency of rail services in Ebbw Vale and Llanhilleth to two trains per hour. The Ebbw Vale town station extension opened in 2015 and provides an extension from the terminus at Ebbw Vale Parkway to the new Ebbw Vale town station. Both stations offer good interchange opportunities with local bus services. The X4 and E3 bus routes connect the railway stations in Ebbw Vale with the settlements of Tredegar, Brynmawr, Nantyglo and Blaina and Abertillery. However, wider bus services in the County Borough are not frequent, varying between 2 and 4 per hour, and there is a more limited service on Sundays. The Public Rights of Way (PRoW) network extends throughout Blaenau Gwent, with 243,805 metres of PRoW accessible to residents and visitors alike, and it is difficult to identify spatial deficiencies in this respect. Additionally, access to cycleways is good throughout the County Borough, with 96% of the population within 1km of the cycle network. The Metro Project proposes the extension of the Ebbw Vale railway line to Abertillery and a new station, which is scheduled for completion in 2022.

## Discuss ion

There are a greater number of higher order settlements in the north of the borough, which offer improved access to employment opportunities and a wider range of services and facilities. Growth focussed at the higher order settlements could therefore help to reduce the need to travel compared to growth in the more rural areas or lower order settlements with less employment opportunities and a poorer range of facilities/ services. Development directed to the higher order settlements with good access to public transport are most likely to encourage a modal shift to more sustainable methods of travel

Taking the above into account, Options 1 and 3 focus growth at the higher order settlements in the north of the borough with Option 1 in particular directing a larger proportion of growth towards Ebbw Vale with good access to sustainable transport. While Llanhilleth in the south also has a train station, it is a smaller settlement and therefore has less employment opportunities and services/ facilities on offer, which means it is less likely to reduce the need to travel. Options 2 and 4 propose distributing growth equally across the borough. While this will result in growth at some of the high order settlements, such as Ebbw Vale, they are more likely to deliver development in the rural areas and lower order settlements, in particular Option 4 as it proposes a high level of growth. As a result, they are less likely to encourage a modal shift and reduce the need to travel. They are however more likely to take advantage of the railway line extension to Abertillery but this would not be completed until 2022 if delivered on schedule.

Option 3 is considered to perform best at this stage and is likely to have a significant long term positive effect as it delivers a higher level of growth and focuses it (new homes, jobs and community infrastructure) at the higher order settlements in the north of the borough with good access to public transport. While Option 1 proposes a similar distribution of development with a greater focus on Ebbw Vale, it also proposes a lower level of growth and would not deliver the same level of

<sup>&</sup>lt;sup>20</sup> Blaenau Gwent County Borough Council (2018) Blaenau Gwent Local Development Plan Annual Monitoring Report 2018

## **ISA Theme: Transport and movement**

employment opportunities or community infrastructure improvements compared to Option 3. Options 4 and in particular 2 perform less well as they propose distributing growth equally across the borough, which would include lower order settlements and rural areas. This will not help to reduce the need to travel or encourage the use of more sustainable transport modes.

### ISA Theme: Natural resources (air, land, minerals and water)

Options	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities  Option 3 - Economic growth strategy		Option 4 - Sustainable economic growth strategy
Rank	1	1	2	2
Signific ant effect?	No	No	Uncertain	Uncertain

Blaenau Gwent is predominantly natural land (67%), with only 20% of the total land area built on, 5% in use as 'green urban' land such as parks and playing fields, and just 9% in use as farmland. Of the small percentage of land in agricultural use, none is the highest quality 'best and most versatile' (BMV) land and therefore growth under any of the options will not result in the loss of BMV land. Despite this, options that propose a lower level of growth are considered to perform better against this theme as they will require less land take. If the majority of growth can be delivered on brownfield land then there is the potential for a positive effect. Given that Option 2 would lead to a negative growth through the loss of existing employment and housing, it can be inferred that in addition to there being zero land take there could also be potential for additional brownfield land to become available for development in future plan periods. Whilst the potential to capitalise on this would be linked to the viability of developing such sites in the future, in natural resources terms this is considered a positive effect. Similarly, as Options 3 and 4 propose high growth within the plan period it is considered that there is potential for higher land take, particularly in the north of the plan area where a higher quantity of available greenfield land is located.

## Discuss ion

Similarly, the lower growth Options 1 and 2 are considered unlikely to result in additional pressure being placed upon the minerals resource in the plan area, particularly its nationally significant coal deposits. Option 3 directs the majority of growth to areas directly adjacent to the coal safeguarding areas, whilst Option 4 also has potential to affect the coal safeguarding areas, though by dispersing growth throughout the plan area it is likely that negative effects will be less pronounced in relation to access to or sterilisation of minerals deposits.

A number of waterbodies in Blaenau Gwent, including rivers and reservoirs are in moderate or poor condition, as per the Water Framework Directive (WFD) classification, though the source of contaminants does not appear to be directly related to housing or employment growth. As such it is not possible to differentiate between the options in terms of water quality.

On balance, it is considered that Options 1 and 2 perform better in relation to the natural resources ISA theme though broadly on a par with each other, whilst Options 3 and 4 perform less strongly though also broadly on a par with each other. Significant effects at this stage are not anticipated as a result of any option; however, there is a greater level of uncertainty for those proposing a higher level of growth.

### ISA Theme: Biodiversity and geodiversity

Options	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Rank	2	1	4	3
Signific ant effect?	No	No	Uncertain	No

It is assumed that development proposed under any of the Options would not result in the loss of any international, national or locally designated sites for biodiversity, though there could still be potential for harm to these sites from development which is sited nearby.

The northern area of the County Borough is considered to be more sensitive in biodiversity terms as the majority of designated sites are located here. This includes two European sites and their component Sites of Special Scientific Interest (SSSIs) that fall partially within the north of the County Borough. The Usk Bat Sites Special Area of Conservation (SAC) is primarily designated for its population of Lesser Horseshoe Bats, whilst the Cwm Clydach Woodlands SAC is designated for its calcareous beech woodland and acid beech woodland. Additional development proposed through the RLDP is most likely to have impacts on these European sites through the loss and fragmentation of linear foraging habitats for bat species and through increased disturbance (recreation, noise and light).

The Cwm Merddog Woodlands SSSI falls entirely within the plan area and is comprised of two parcels of land that are situated to the north east of the village of Cwm in the centre of the County Borough. Two further SSSIs fall partly within the plan area in the north, Mynydd Llangatwg SSSI and Brynmar Sections SSSI. There are an unusually large number of special features associated with Mynydd Llangatwg SSSI, suggesting particularly notable sensitivity. The management statements for these SSSIs suggest that the management of the land is key to maintaining a favourable condition status, highlighting the importance of managing new development in the vicinity of the sites. Disturbance is identified as an issue for both sites and it is likely that additional growth nearby would increase the risk of disturbance further.

## Discuss ion

Similarly, of the 12 Local Nature Reserves (LNR) in the Plan area there is a notable concentration in the north along the Heads of the Valleys road corridor, with the remainder more evenly distributed. Options 1 and 2 would direct the majority of growth to the Heads of the Valleys, which may lead to additional recreational pressure on the Beaufort Hills Pond and Woodland LNR and the Parc Nant-y-Waun LNR in particular. A number of Sites of Importance for Nature Conservation (SINCs) surround the urban areas of Blaenau Gwent and several lie within the urban areas, suggesting that growth under any of the Options will likely have localised effects on SINCs.

Options 1 and in particular 3 (given the higher level of growth) focus a greater proportion of growth in the north of the County Borough and are therefore considered more likely to have impacts on the designated SACs and SSSIs, as well as on locally designated sites, through the introduction of greater recreational pressure and higher emissions from the associated additional vehicle users. However, by concentrating growth in the north, Options 1 and 3 may potentially offer opportunities to deliver larger scale developments (subject to land supply) offering greater potential to deliver strategic green infrastructure, including the potential for achieving a more significant level of biodiversity net gain.

While Option 4 would deliver the same level of growth as Option 3, it proposes to distribute it more evenly across the borough. This would help to potentially reduce the level of growth delivered in the north of the borough in close proximity to sensitive receptors but could result on impacts more widely across the borough. Option 2 performs better compared to the other options as it would deliver the lowest quantum of growth and proposes that it is distributed evenly across the borough. It is therefore less likely to result in development in close proximity to sensitive receptors and less likely to result in habitat loss and fragmentation throughout the borough.

The nature and significance of effects will ultimately depend on the precise location and scale of development at each development site along with the implementation of mitigation measures.

#### ISA Theme: Historic environment

Options	Option 1 - Growth and regeneration (current LDP)			Option 4 - Sustainable economic growth strategy
Rank	2	1	4	3
Signific ant effect?	No	No	Uncertain	Uncertain

A number of historic assets are distributed across Blaenau Gwent, both in the urban areas and in more rural locations. 53 listed buildings are distributed relatively evenly between the principal northern settlements, though a cluster of listed buildings is evident at Tredegar, suggesting heightened historic sensitivity. The cluster at Tredegar corresponds with the area around the County Borough's only Registered Historic Park and Garden (RHPG) at Bedwellty Park, which is also a designated Conservation Area. A second Conservation Area at Tredegar, the Southern Town Area, lies immediately north of Bedwellty Park. In general, however, the distribution of Listed Buildings within the north of Blaenau Gwent is scattered, with no other hotspots of particular heritage sensitivity. There is a notable absence of listed buildings in the south by comparison, and there are no other Conservation Areas or RHPGs.

Blaenau Gwent's 13 Scheduled Ancient Monuments are predominantly within or adjacent to the existing settlements, with a particular focus in the northern settlements. These features reflect both the industrial history of the area and its ancient Celtic heritage. For example, features such as the Marine Colliery Pumping Engine in Ebbw Vale and the Incline Haulage Winding Engine near Tredegar contribute to an understanding of the area's industrial heyday, whilst features such as cairns, hut circles and mounds point to a historic identity dating back to a much older era. Whilst it will be important to avoid development which results in negative effects on these features, it is considered that the choice of spatial strategy has a limited role to play. None of the Options offer notable positives or negatives in relation to the County Borough's Scheduled Ancient Monuments.

## Discuss ion

New development can offer the potential opportunity to promote, protect and enhance heritage assets, supporting the distinct sense of identity at each settlement, and building on established heritage and cultural identity. However, new development could also have potential for negative effects on the historic environment, if design, layout and massing of new schemes detracts from the overall historic character of an area or obscures specific historic features and their settings. It is recognised that Blaenau Gwent's cultural assets also include the use of the Welsh language. None of the Options are considered likely to have a significant effect on the Welsh language, and it is therefore not possible to distinguish between the Options in this respect.

Generally, the options that propose a higher level of growth are more likely to have impacts on the historic environment and therefore perform less well in terms of this ISA theme. There are designated heritage assets spread across the borough and the nature and significance of effects will ultimately be dependent on the precise location of development. Option 2 would deliver the least amount of growth during the plan period and would distribute it equally across the borough. It is therefore predicted that this option is less likely to have impacts on the historic environment compared to the other options. While Option 3 proposes a similar equal distribution of development across the borough it would deliver a much higher level of growth. As a result, it has a greater likelihood of having impacts on the historic environment compared to Option 2. Options 1 and 3 both focus growth in the north of the borough with Option 1 having a particular focus on Ebbw Vale, which means they are more likely to have impacts on the historic environment in the north. Option 3 is likely to result in the most growth in the north of the borough, which includes in and around Tredegar where there is a cluster of designated heritage assets.

#### ISA Theme: Landscape

Options	Option 1 - Growth and regeneration (current LDP)			Option 4 - Sustainable economic growth strategy
Rank	1	1	2	3
Signific ant effect?	No	No	No	Uncertain

As for a number of other ISA themes, the nature and significance of effects on landscape/ townscape impacts will ultimately be dependent on the precise location and design of development. Blaenau Gwent has a rich and diverse landscape bordering the Brecon Beacons National Park, and the Blaenavon Industrial Landscape World Heritage Site. Special Landscape Areas within Blaenau Gwent that are designated in the currently adopted LDP cover a total area of approximately 7,614 hectares, accounting for approximately 70% of the total local planning area within Blaenau Gwent area.

Options proposing a higher level of growth, in particular Options 3 and 4, will require more land take and are therefore more likely to have impacts on the landscape impacts across the borough compared to Options 1 and in particular 2 which propose a lower level of growth. If the majority of this additional growth is delivered on brownfield land then there is the potential for positive effects on the landscape/ townscape through the regeneration of previously developed land if sensitively designed. If the majority of additional is delivered on greenfield land on the edge of existing settlements then there is the potential for negative effects; however, it is likely that suitable mitigation is available to reduce the significance of any residual effects. Delivery of this additional growth in the more rural areas is more likely to result in a residual significant negative effect but is dependent on the sensitivity of the landscape and scale and design/ layout of development.

## Discuss ion

Directing the majority of additional growth to the northern settlements, as per Options 1 and 3 offers potential for development to sit comfortably within the existing built context without necessarily impacting views into the area from the Brecon Beacons and other surrounding areas of high ground. However, this is dependent on the scale of development and precise location. Options 4 would direct more growth to the south of the County Borough, which appears notably more constrained in landscape capacity terms. In this context, it is considered that even if growth in the south were delivered largely on brownfield sites, it would likely be necessary to densify considerably to achieve high growth. This has the potential to affect how settlements in the south are perceived within the landscape, particularly Abertillery which has a distinctive and characterful setting within the valley. In this context it is considered that the north of the County Borough has slightly lower landscape sensitivity, despite the proximity of the BBNP. The northern settlements, and particularly along the Head of the Valleys corridor, already represent a substantial urbanised area and are viewed in the landscape in this context, whilst the south is notably more rugged and less developed, and its dramatic landscape setting is considered more sensitive to change. While Option 2 distributes development equally across the borough as per Option 4, it would deliver a lower level of growth and is therefore less likely to have residual negative effects on the landscape in the south.

#### ISA Theme: Climate change

Options	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy
Rank	2	1	3	3
Signific ant effect?	No	No	No	No

In terms of climate change mitigation, a higher level of growth will ultimately lead to increased levels of greenhouse gas (GHG) emissions. There is nothing to suggest that the higher levels of growth could provide a unique opportunity to help reduce per capita GHG emissions. Furthermore, there is no evidence to suggest that the additional growth could potentially provide a unique opportunity for the delivery of new low carbon or renewable energy. It is therefore assumed that development proposed under any of the options has the potential to incorporate renewable or low carbon energy.

## Discuss ion

In terms of climate change adaptation, it is assumed that growth will be directed to areas of lower flood risk as per the sequential test. Evidence (Preliminary Flood Risk Assessment, June 2011) suggests that the main areas of flood risk are at Abertillery, Ebbw Vale and Tredegar, where there are historic river courses and waterways. All Options could therefore direct development to areas identified as being at high risk from flooding. It is however considered that Option 1 and 3 perform less well in this respect given the focus of growth at these settlements. The nature and significance of effects will ultimately be dependent on the precise location of growth.

Taking the above into account, it is considered that the Options proposing a lower level of growth perform more positively against the climate change theme. There is no evidence to suggest that any of the options are likely to have a significant effect.

### Summary findings and conclusions for spatial strategy options

		Categorisation and rank				
ISA Themes	Rank/ Significant effects	Option 1 - Growth and regeneration (current LDP)	Option 2 - Balanced and interconnected communities	Option 3 - Economic growth strategy	Option 4 - Sustainable economic growth strategy	
	Rank	2	3	1	1	
Economy and Employment	Significant effect?	Uncertain	Yes - Negative	Yes - Positive	Yes - Positive	
Population	Rank	2	3	1	1	
and Communities	Significant effect?	No	Yes - Negative	Yes - Positive	Yes - Positive	
Health and	Rank	3	4	1	2	
Health and wellbeing	Significant effect?	Uncertain	No	Yes - Positive	Uncertain	
Equalities,	Rank	2	3	1	2	
diversity and social inclusion	Significant effect?	Yes - Positive	No	Yes - Positive	Yes - Positive	
Transport	Rank	2	4	1	3	
and movement	Significant effect?	Uncertain	No	Yes - Positive	Uncertain	
Natural	Rank	1	1	2	2	
Resources	Significant effect?	No	No	Uncertain	Uncertain	
Biodiversity	Rank	2	1	4	3	
and geodiversity	Significant effect?	No	No	Uncertain	No	
Historic	Rank	2	1	4	3	
Environment	Significant effect?	No	No	Uncertain	Uncertain	
	Rank	1	1	2	3	
Landscape	Significant effect?	No	No	No	Uncertain	
Climata	Rank	2	1	3	3	
Climate Change	Significant effect?	No	No	No	No	

Options 3 and 4 are considered to perform better compared to Options 1 and 2 against ISA themes relating to the economy and employment, population and communities, health and wellbeing and equalities, diversity and social inclusion. They propose a higher level of housing and employment growth and are therefore more likely to meet the needs of the borough. They are also more likely to deliver greater improvements to community infrastructure and the public realm. The delivery of new homes, employment opportunities and associated infrastructure can help to address deprivation and reduce social exclusion. As a result, they are identified as having the potential for a significant long term positive effects against themes relating to the economy/ employment, population/ communities and equalities/ diversity/ social inclusion themes. Option 2 performs less well against these ISA themes as it proposes the lowest level of growth and is unlikely to meet the needs of communities. It is therefore identified as having the potential for a significant long term negative effect against the economy and employment and population and communities themes.

Options 1 and 2 generally perform more poorly against ISA themes relating to biodiversity, historic environment, landscape, natural resources and climate change. The higher levels of growth increase the likelihood of impacts and therefore negative effects; however, this is dependent on the location of development. Option 3 is identified as being most likely to result in impacts to sensitive biodiversity and historic environment receptors in the north of the borough. While Option 1 proposes a similar distribution of development it proposes a lower overall level of growth and is therefore less likely to have negative effects. Option 4 is more likely to have impacts on the sensitive landscape in the south of the borough.

In terms of transport and movement, Option 3 is considered to perform best at this stage and is identified as likely to have a significant long term positive effect. It delivers a higher level of growth and focuses it (new homes, jobs and community infrastructure) at the higher order settlements in the north of the borough with good access to public transport. While Option 1 proposes a similar distribution of development with a greater focus on Ebbw Vale, it also proposes a lower level of growth and would not deliver the same level of employment opportunities or community infrastructure improvements compared to Option 3. Options 4 and in particular 2 perform less well as they propose distributing growth equally across the borough, which would include lower order settlements and rural areas. This will not help to reduce the need to travel or encourage the use of more sustainable transport modes.